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ABSTRACT

The purpose of this study was to investigate the ability of the State licensing and monitoring program to safeguard children and to determine whether licensing and monitoring were being uniformly applied throughout Illinois. In order to address these questions, information was collected from three sources: (1) interviews with representatives of the State agencies involved in the regulation of day care facilities and with the State employees who license day care homes and centers, (2) surveys of day care operators, day care workers, and parents of children in day care, and (3) special studies designed to check on the uniformity of application of standards and the actual compliance with standards. The findings generally indicate that the quality of licensing, monitoring, and enforcement functions all appear to be limited to some extent by insufficient personnel and heavy workloads. Four types of recommendations are offered: (1) those intended to ensure uniform application of day care standards, (2) those which would enable day care consumers to play a larger role in day care regulation, (3) those designed to achieve more effective use of personnel, and (4) those which would improve the general effectiveness of monitoring and enforcement. (JMB)

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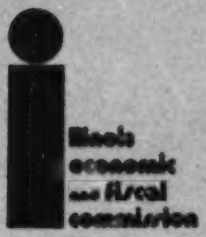

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ILLINOIS ECONOMIC AND FISCAL COMMISSION

PROGRAM EVALUATION

DAY CARE LICENSING AND REGULATION

SUMMARY

As the number of children enrolled in licensed day care facilities in Illinois has increased, concern for the quality of these facilities has also increased. In January 1972, six children died in a fire in a licensed day care home in Chicago which was found to have been in violation of State day care standards. In 1974, an infant was killed by another child while sleeping on a couch in a licensed home. The baby was on the couch because the home did not have enough cribs, a violation of the standards.

Apart from the human tragedy involved, court decisions in other states have aroused concern that the State of Illinois could be held jointly liable in some future incident, if inadequate supervision of a licensed facility were proved. One of the main goals of this study was to investigate the ability of the State licensing and monitoring program to safeguard children. Another goal was to determine whether licensing and monitoring were being fully and uniformly applied throughout the state.

In order to address these questions, the IEFC staff interviewed representatives of all State agencies which are primarily involved in the regulation of day care facilities, as well as the individual State employees who license day care homes and centers. We surveyed random samples of approximately 1,000 licensed day care home and 1,000 day care center operators in the state, 230 day care center workers, 700 parents of children in day care centers, and 580 parents of children in day care homes. Special studies were designed to check on the uniformity of application of standards and the actual compliance with standards.

Conclusions and recommendations included in this report are those of the staff and not necessarily those of the Economic and Fiscal Commission or any of its members.

Overview of Day Care (Chapter II). Illinois has been involved in licensing child care facilities since 1933. The chapter reviews current legislation vesting day care regulation authority in the Department of Children and Family Services (DCFS). Day care licensing is one among many responsibilities of DCFS and, in fact, accounted for less than one percent of the Department's budget in FY 1974. The chapter also describes the role of other State agencies in the day care licensing process.

Day care facilities are classified in two categories--homes and centers. The legal difference between them is that day care homes care for eight or fewer children (including the operator's own children under 18), while day care centers care for more than eight children. However, the actual size differences are more marked--an average of 4.9 children per home and 50.5 children per center (pp. 9, 10).

In addition, homes and centers differ in the type of program offered. Homes tend to be more informal, while centers usually have a relatively structured preschool education orientation. Because of the overall differences between homes and centers, there are different standards for each, and subsequent sections of the IEFC staff report also treat them differentially where necessary (pp. 11, 12).

Both nationally and in Illinois, demand for day care services is likely to increase as more mothers enter the labor force. Between 1950 and 1972, the participation rate of women who had ever been married rose by 60% nationally. By 1970, 43% of Illinois women were employed outside their homes. These trends foreshadow a need for expanded regulatory capacity on the part of the State (pp. 8, 9).

Organization and Personnel (Chapter III). Actual licensing and monitoring of day care facilities is conducted by DCFS personnel operating in 14 areas throughout the state. Following the reorganization of DCFS in early 1974, these staff were organized into teams, each of which is supervised by a licensing coordinator. These coordinators are in turn responsible to area administrators.

Along with the 1974 reorganization, another change was the creation of the Office of Child Development (OCD). OCD is responsible for overseeing day care licensing and developing a State plan for day care, among other duties. OCD has an administrative office at Springfield and an office at Chicago which is actually engaged in licensing. However, except for its own Chicago operation, OCD has no formal authority over licensers. Eighty-eight percent of licensers surveyed agreed that a statewide coordinator is needed (pp. 15, 16).

It appears that the day care licensing function has a fairly low status within DCFS. Furthermore, many licensers felt that their jobs were being downgraded through the use of nonprofessionals (paraprofessionals and volunteers). Because of the complexity of the licensing task, it is recommended that DCFS use nonprofessionals to supplement, but not to replace, professional licensers (pp. 21, 22).

The chapter also looks at the day care licensers in the field--their background, training, task structure, and workloads. Licensing representatives are drawn from a variety of backgrounds, often with little specific preparation for the licensing task. Training of licensers provided by DCFS is found to be generally inadequate (pp. 15-23).

Prior to 1974, licensers acted as both enforcers of standards and consultants to day care facilities. The reorganization separated the two functions, establishing licensing (standards enforcement) teams and resource development (consultation) teams in each area. Some former day care personnel were assigned to each type of team.

The new licensing teams license and monitor all types of child care facilities--foster homes and adoptive homes as well as day care homes and centers. There is some resistance to this change among former day care licensers, and considerable training will be required so that all personnel understand their new responsibilities (pp. 18, 19).

In July 1974, we were told that licensers will again be allowed to provide consultation on program development and improvement where needed. The evident indecision about the licenser's role has given rise to some confusion and morale problems among licensers.

Day care licensing staff workloads appear to be quite heavy and may contribute to licensing and monitoring deficiencies noted in later chapters. Based on the number of licensed day care facilities reported by DCFS, an overall FTE staff/facility ratio was calculated to be one FTE worker for every 135 licensed facilities. Survey data show that only three states (New York, Iowa, and North Carolina) of the 43 which responded have higher ratios of licensed day care facilities to "full-time equivalent" licensing staff than Illinois. It is recommended that DCFS consider whether additional personnel are needed to expand the Department's day care licensing and monitoring capacity.

The chapter concludes with specific recommendations for improving licensing coordination and personnel training, including: (1) a State director of licensing, (2) a systematic training program for licensers, (3) a requirement that licensers pass a test on standards before they begin to license facilities, (4) periodic in-service training sessions for licensers, (5) a completely revised licensing services manual, and (6) a State plan for day care licensing (pp. 23, 24).

Day Care Standards (Chapter IV). The criteria against which day care homes and centers are measured in assessing their ability to provide adequate care are specified in the day care standards. These include criteria related both to the physical facilities available in the care unit and to the personal characteristics of operators and their staff. To serve their purpose, the standards should be reasonable and adequate to protect children and ensure a minimum level of care. Also they should be understood and accepted by day care operators, staff, and parents.

Operators generally seem to understand and accept the standards. However, according to IEFC staff surveys, only about 20% of the parents of children and staff in day care facilities have read the standards.

It is recommended that DCFS prepare summaries of home and center standards to be given to parents by the operator when children are enrolled in a licensed facility (pp. 27, 64).

The standards most likely to be violated, according to operators' responses to our surveys, relate to overenrollment and child/staff ratios. But violations of the standards seldom lead to revocation or nonrenewal of licenses (pp. 27, 28, 32, 33).

The decision whether or not to license day care centers were found to be most closely associated with fairly tangible health, safety, and record-keeping standards. In day care homes the violations most often associated with the renewal decision were related to objective standards. Some potentially important but more subjective standards, such as the adequacy of supervision given to children, did not seem to be generally significant in the renewal decision.

DCFS recently received a federal grant to revise the State's standards for day care facilities and has established a committee for this purpose. It is recommended that such a revision take into consideration changes which were recommended by program participants. Three changes in the standards were frequently mentioned as desirable by those surveyed: (1) child/staff ratios should be lowered; (2) the dividing line between homes and centers should be changed from eight children to seven; and (3) a day care home operator's own children should not be charged against the home's licensed capacity after age 14, instead of the present age of 18 (pp. 26, 29-33).

It is also recommended that consideration be given to establishing a hierarchy of standards, perhaps with three ranks. The first, most important group might include fire and safety hazards and corporal punishment. Violation of any one would result in denial of a license. Perhaps three violations of standards in the second group might be tolerated before the license would be revoked or denied. These could include standards relating to individual lockers, outdoor play periods and so on. The third group could deal mainly with record-keeping and procedures, and five or six violations might be tolerated.

Uniformity of Application (Chapter V). Accurate and uniform application of the day care standards is an important condition for assuring protection for day care clients and equal treatment under the law for operators. Three independent studies were conducted by the IEFC staff to assess various aspects concerning the uniformity with which standards are applied. In all three studies serious discrepancies in application were documented. These seem to be caused by differences both in interpretation and application of standards by licensing representatives (pp. 35-41).

Problems of nonuniformity are compounded by the lack of a standard statewide form for rating day care facilities. In 12 DCFS district offices surveyed, 11 different licensing appraisal forms were identified. Further, some appraisal forms were found to contain irrelevant items, such as the family's religious preference, the mother's hobbies, and the father's physical build. Center appraisal forms were found to be deficient in areas such as the program and care provided by the center. It is suggested that the licensing forms be revised and standardized throughout the DCFS system. Also, the possibility of using a form which employs an "A-to-F" grading system should be considered as an alternative to the present format. This would help to pinpoint problem areas in a day care facility.

To promote uniformity in the application of standards, it is recommended that training of new licensers be upgraded and that new licensing personnel be given an examination on standards. Furthermore, it is suggested that a more detailed instruction manual on day care licensing be formulated and distributed to present licensing staff. For facilities on the borderline of compliance, our findings suggest that two licensers should be sent to conduct the evaluation. Also, given current levels of uniformity, it is recommended that operators denied a license be allowed to request a second visit by a different licenser (pp. 41, 46).

License Issuance (Chapter VI). This chapter reviews each step of the initial licensing process, from the time a person inquires about applying until a license is granted or denied. The initial licensing process acts to weed out substandard facilities. Only 24% of the people interested in home licenses and 42% of those interested in center licenses follow the process through and ultimately obtain a license.

Several difficulties with the present procedure for initial licensing were discovered in the course of the study. According to our survey, many potential applicants might not know whom to contact for licensing information. It is recommended that DCFS publicize its responsibilities for day care licensing more widely (pp. 48, 79, 80).

Several types of delay in the licensing process were documented in this chapter. It is possible that such delays discourage some good potential operators, and so recommendations are suggested which would alleviate these delays (pp. 47-52).

After requesting a licensing inspection, some applicants had to wait more than two months before a licenser actually visited. It is recommended that this period be shortened to no more than four weeks and that additional clerical help required to meet this goal be provided (pp. 48, 49).

Many delays are experienced in arranging for other agencies' inspections of facilities, especially local health, fire and building departments. It is recommended that DCFS licensers become familiar with local codes and work closely with local officials to clear up difficulties (pp. 50, 51).

Delays occur in the DCFS Springfield central office even after the licenser in the field is satisfied with a facility. It is recommended that DCFS use licenses with the Director's signature preprinted to avoid the delay caused by requiring his original signature on each license (p. 51).

Under the Child Care Act of 1969, local child welfare agencies can make initial licensing studies. It is recommended that DCFS at least conduct inspection visits of facilities whose licensing visits were done by these agencies (p. 51).

For day care centers, DCFS may issue either a license good for two years or a permit good for six months. The permit option could be extended to day care homes by an amendment to the Child Care Act. Consideration should also be given to allowing the licensing representative in the field to issue a 30-day permit so that the operator can begin taking in children immediately without waiting for paperwork processing at Springfield. As an alternative, initial licenses might be limited to one year rather than two, in order to provide a probationary period for new facilities (p. 52).

Monitoring of Day Care Facilities (Chapter VII). To assure continuing compliance with day care standares, DCFS licensing representatives are required to visit each licensed facility at least once a year and more frequently "as deemed necessary." However, there is confusion among licensers about this policy. Some reported that as many as four visits a year were required to day care homes, while others said that interim visits need be made only in response to complaints received, not on a periodic basis.

Last year day care home operators reported receiving an average of 1.7 visits, while center operators reported receiving an average of 2.4 visits. Thus, the requirement of one annual visit is generally being met.

On the other hand, nearly 10% of home and center operators reported receiving no visits from a DCFS licenser last year. Such a percentage indicates that as many as 680 day care facilities across the state may not have been visited at all last year by DCFS (p. 57).

It is recommended that DCFS reexamine its policy regarding interim visits. Since interim visits are necessary in order to adequately

monitor day care facilities, the Department should consider increasing the required number of visits. Data from parents, staff, operators, and licensers indicate a clear consensus that at least two visits are needed. Once the policy is determined, it should be clearly communicated to licensers in the field (pp. 56-59).

An increase to two visits per year to each facility would necessitate an additional 10.4 FTE licensing staff. However, data presented in Chapter IX regarding the inadequacy of current monitoring efforts indicate that such an increase appears necessary (p. 59).

In addition to these "interim visits," a "relicensing" study is made when an operator's two-year license is due to expire. Many licensing representatives use the relicensing study to weed out substandard facilities by persuading operators not to renew their licenses (p. 61).

Several steps can be taken to increase the efficiency of day care monitoring. First, increase the number of required visits. Also, it is recommended that DCFS take steps to enhance the role of parents in monitoring the quality of care provided. Parents should be given "consumer guides" to day care which would summarize the standards. Parents should also be allowed access to licensing appraisal forms. Also, DCFS should periodically survey parents to obtain feedback on program effectiveness.

Furthermore, it is recommended that unannounced interim visits be used more frequently in order to increase the licenser's chance of getting a true picture of the conditions in day care facilities. Operators and licensers have expressed the opinion that unannounced visits provided more accurate information on the quality of care provided than announced visits (p. 60).

It is noted that a licensing representative is expected to be both a strict enforcer of standards and a friendly advisor. Licensing coordinators should be aware of this conflict (pp. 64-66).

A number of other State agencies besides DCFS are involved in visiting and evaluating day care centers. It is recommended that these agencies coordinate joint visits wherever feasible, so that all their inspectors visit a center at the same time. On an IEFC staff survey, over three-fourths of centers which receive funding from more than one State agency favored joint visits (pp. 66, 67).

Enforcement (Chapter VIII). The chapter discusses formal enforcement procedures whereby operators in violation of day care standards are brought into compliance or denied a license. At least until very recently, DCFS has not pursued formal enforcement vigorously. It is recommended that legal action, including use of injunction, both for licensed facilities with serious violations and for unlicensed facilities, should

be increased. Further, DCFS' records of enforcement actions are inadequate, and it is recommended that such records be improved and be kept on file at the DCFS central administrative office (pp. 69, 70).

Survey data indicate that a licenser is more likely to initiate enforcement action if she feels DCFS will support the action. Our findings indicate that, in the past DCFS has not provided such support (pp. 72-74).

Quality and Effectiveness (Chapter IX). This chapter considers the overall effectiveness of the State's day care licensing and regulation program from several perspectives. The most direct measure used is child abuse in licensed day care homes. Eighteen cases were found for the period 1969-1973. It was found that homes where abuse occurred had been visited less often by DCFS licensers than other homes, and in only three cases had the licensers felt concerned about the home prior to the abuse incident (pp. 75-78).

Prevention of child abuse in licensed homes is complicated by the difficulty in checking names of day care license applicants against names of known child abusers. Accordingly, it is recommended that a computerized file of child abusers be constructed, to be used in screening applicants for day care licenses (p. 78).

Another measure of effectiveness is the degree to which unlicensed facilities operate in the state. The widespread operation of unlicensed homes is identified as a major problem. It is estimated that over half of the day care homes operating in Illinois are unlicensed. A more active publicity program on the need for a day care home license is recommended (pp. 78-80).

In addition, a more vigorous effort to discover unlicensed homes and to prosecute unlicensed operators appears to be necessary. This will probably require the allocation of additional manpower to day care licensing and greater coordination with State's Attorneys. The use of local volunteers to assist in efforts to identify and deal with unlicensed facilities is recommended (p. 80).

Another effectiveness indicator is the degree of actual compliance with standards in licensed facilities. A spot-check was performed in a sample of licensed day care centers. On the average, the spot-checked centers were found to have 4.5 violations. Data from the paired-observers study (see Chapter V) also demonstrate that noncompliances exist in licensed facilities (pp. 81-83).

The satisfaction of program participants with the program is another indicator of effectiveness. Overall satisfaction with the quality of care in licensed facilities and with the regulatory process appears to be relatively high. Over three-fourths of operators, staff, parents, and licensers felt that State regulation of day care facilities was necessary, and large majorities of parents were very satisfied with the day care facilities in which their children were enrolled (pp. 84-87).

Conclusion (Chapter X). The chapter summarizes recommendations made by the IEFC staff throughout the report. They fall roughly into four groups--those intended to ensure uniform application of day care standards, those which would enable day care consumers to play a larger role in day care regulation, those designed to achieve more effective use of DCFS personnel, and those which would improve the general effectiveness of monitoring and enforcement (p. 88).

A recurring theme throughout the study concerns the inadequacy of manpower allotted to day care licensing in the state. Quality of the licensing, monitoring, and enforcement functions all appear to be limited to some extent by insufficient personnel and heavy workloads. Consequently, serious attention should be given to a review of staffing of the day care licensing program and to correction of observed deficiencies (pp. 88, 89).

The chapter considers three alternatives to the current system: complete deregulation; registration, rather than licensing, of day care homes; and evaluation of day care facilities by a professional organization of day care operators. Deregulation or registration of day care homes would probably not provide sufficient protection to children, and "peer evaluation," through an accreditation process similar to that for schools or hospitals, may have potential as a supplement--but not a replacement--for State licensing (pp. 89-91).

Appendices. More complete technical information relating to each chapter is contained in the appendices, which are designated by a chapter number and an appendix number (e.g., Appendix VI-1 is the first appendix to Chapter VI). Appendix I-2 is a glossary of terms and abbreviations used throughout this report. Appendix X-1 is not a true appendix to Chapter X but contains the unedited response from DCFS regarding IEFC staff findings presented in this report.

I. PURPOSE AND SCOPE

In the Spring of 1974 there were approximately 120,000 children enrolled in State-licensed day care homes and centers in Illinois. There were 4831 licensed day care homes (facilities caring for eight or fewer children) in the state and 1823 licensed day care centers (which care for more than eight children).

As the number of children enrolled in licensed day care facilities has increased, concern for the quality of these facilities has also increased. In January 1972, six children died in a fire in a licensed day care home in Chicago which was found to have been in violation of State standards. In February 1974, an infant was killed by another child while sleeping on a couch in a licensed home. The baby was on the couch because the home did not have enough cribs, a violation of the standards. That home had not been inspected in 15 months, although regulations require that a representative of the Department of Children and Family Services (DCFS) visit each licensed home at least once a year.

Such cases may have very direct significance for the State. A court in Arizona recently held the State jointly liable for a $1 million judgment to a six-year-old boy who was abused while living in a foster home licensed by the State. The court ruled that the State, as well as the foster parents, must pay the damages because the State did not supervise the home adequately. Some experts feel that this ruling, and a similar Louisiana case, may ultimately be extended to abuse cases in licensed day care facilities.

On April 26, 1972, the Illinois Budgetary Commission (the predecessor agency of the Economic and Fiscal Commission) held a hearing on day care. At the hearing, William Pierce of the Child Welfare League of America said:

> I want to . . . comment in one area that is very practical and which I think merits the attention of the Commission. That area is the standards for day care and enforcement of those standards for the day care which now exists in Illinois. . . . Enrollments, ages of children served, the hours care is given, all need to be monitored to insure that children receive the care that they require and that parents expect by virtue of the day care program being licensed.

In May 1973, the Illinois Economic and Fiscal Commission authorized its staff to undertake an evaluation of day care licensing and regulation in Illinois. In the process of designing the study, we consulted legislators and their staff with responsibility and interest in day care, including members of the Child Care Study Commission which

was established by House resolution last fall. The study design we adopted was intended to include issues of concern to them.

The study was limited to day care homes and centers as defined in the Child Care Act; that is, facilities which provide care during the day to children unrelated to the operator. We did not study foster homes, night care facilities, or other special categories of facilities. Because of the extreme difficulty in locating unlicensed facilities, and in securing the cooperation of unlicensed operators, we do not have data from day care homes or centers which operate without a State license. We did, however, estimate the number of unlicensed facilities and make some recommendations aimed at bringing them within the DCFS regulatory system.

To be effective in ensuring the adequacy of facilities and safeguarding children, a day care licensing program should have the following attributes:

1. Responsibility and goals for the day care licensing program should be clearly defined, both at the central office and in the field. Vague goals and diffusion of responsibility within the organization tends to weaken accountability to both legislative and executive authorities. Organization is considered in Chapter III.

2. There should be a sufficient number of trained personnel to carry out the licensing function. This will be discussed in Chapters III and VIII.

3. The licensing standards should be adequate to protect children and ensure a minimum level of care. If standards are inadequate, even facilities which meet them may not protect children well enough. This question is addressed in Chapter IV.

4. The standards should be understood and accepted by providers and consumers of day care services. If day care operators and parents do not understand and accept the standards, day-to-day compliance will be harder to achieve. This question is also considered in Chapter IV.

5. The standards should be interpreted and applied by licensing representatives in a uniform and consistent manner. If they are not, even the most stringent and comprehensive standards may not assure adequate safeguarding of children. In addition, nonuniform application of standards may raise legal "equal protection"

questions if some operators are treated more severely than others merely because of their licensing representative's idiosyncratic interpretations. Uniformity is analyzed in Chapter V.

6. The licensing process itself should proceed as quickly as is consistent with its function of screening out substandard facilities. Undue delays may discourage potentially excellent operators, or may cause some operators to violate the law by operating without a license. The initial licensing process is discussed in Chapter VI.

7. A sufficient number of inspection visits to facilities must occur. Even if standards are adequate and are uniformly applied, children may not be properly safeguarded unless day care facilities are inspected frequently and thoroughly. To some extent, enhancing the ability of parents to monitor day care quality would aid in the ongoing inspection process. The monitoring system is discussed in Chapter VII.

8. Adequate and timely enforcement procedures must exist and must be used. If substandard facilities are allowed to continue in operation, children in those facilities are endangered. Also, the absence of a credible enforcement process makes it more difficult to persuade marginal facilities to come into full compliance with standards. Enforcement practices are discussed in Chapter VIII.

If these conditions are met, certain achievements can be expected of the day care licensing system. These include:

absence of child abuse or neglect in licensed day care facilities;

low incidence of unlicensed facilities in operation; and

relatively high satisfaction with licensed day care facilities among parents.

Data sources and findings. The IAFC staff interviewed representatives of all State agencies which are primarily involved in the regulation of day care facilities. These include DCFS, the Office of Superintendent of Public Instruction (OSPI), the Departments of Public Health, Mental Health, and Public Aid, and the State Fire Marshal. In addition, we interviewed State employees who license day care homes and centers. We also surveyed random samples of approximately 1,000 licensed day care

home and 1,000 day care center operators in the state; 230 day care center workers; 700 parents of children in day care centers; and 580 parents of children in day care homes. (A fuller description of these surveys is given in Appendix I-1.) Furthermore, we mailed questionnaires to the agencies in the other 49 states with day care licensing responsibilities and to a sample of State's Attorneys. The response rate in all surveys was over 40%.

Uniformity of application of standards was examined thoroughly in a "paired-observers" study and a videotape simulation. In the former, pairs of day care licensing representatives inspected a facility and separately rated its compliance with standards. In the videotape simulation, all day care home licensers watched a videotape of simulated interviews with two potential applicants for a license and independently rated the suitability of each applicant.

Our major findings include the following:

there have been at least 18 instances of child abuse in licensed day care homes since 1969;

there is only minimal monitoring to ensure that standards are being met by licensed facilities;

one-third to one-half of children in day care facilities are enrolled in unlicensed facilities;

for both homes and centers there is a definite lack of statewide uniformity among licensing personnel in the interpretation and administration of standards; and

where serious violations are found, there are a variety of factors which make it difficult to revoke a license or close a facility.

Our findings should be useful in the revision of day care licensing standards which is currently being undertaken by a statewide committee affiliated with the Department of Children and Family Services. Recommendations are made for possible changes in the Child Care Act of 1969, especially with regard to the definition of homes and centers and the enforcement of standards. We have also recommended new administrative policies for the licensing and monitoring of day care homes and centers. Suggestions have been made for increased monitoring and for staff training and development.

The report begins with an overview, in Chapter II, of the day care licensing and regulation process, including data on the demand for day care services and a short history of day care legislation. It then describes the various aspects of the licensing and regulation program. Chapters III through IX contain an evaluation and analysis of the present

system, as outlined on page 88, Chapter X summarizes some of the key conclusions and recommendations in the report and considers what improvements in the current licensing and regulation system could be expected from implementing those recommendations. The chapter also examines the advantages and disadvantages of various alternatives to the current system.

A glossary of terms and abbreviations used throughout the report is presented in Appendix I-2.

For the IEFC and its staff, this program evaluation has been a welcome opportunity to serve both the legislature and the people of the state. It is part of a series of evaluation studies begun in 1972 which has included to date such subjects as the public community colleges, water resources management, State revolving funds, and student financial aid programs. These studies conform with the responsibility stated in our statute which speaks of the need "to establish program priorities and to coordinate available resources to the end that the maximum benefits be produced efficiently and economically."

Our evaluations of state-supported programs not only contain information about whether such programs are making economical and efficient use of available resources; they also serve to focus on how effective programs are in serving the people for whom they are intended and whether they are achieving the objectives the General Assembly had in mind in creating them. We hope that these special studies will prove helpful to legislative decision-makers in the substantive and appropriations committees and in such bodies as the Child Care Study Commission.

Conclusions and recommendations included in this report are those of the staff and not necessarily those of the Economic and Fiscal Commission or any of its members.

We wish to express our appreciation for their assistance and cooperation to: the central DCFS administration for expediting our field research activities and for facilitating the paired-observers study; all day care licensing staff for their participation in all phases of this study (especially Ruth Kruse and Brenda DeFrates for their participation in the videotape simulation); and Larry Broquet, Director of Educational/Instructional Television, OSPI, for technical assistance and production of the videotape. Our thanks also go to licensing and child care experts Norris Class, James Harrell, Mary Keyserling, William Pierce, and Maria Piers for their advice and suggestions during the course of the study. Finally, thanks go to our secretarial staff for preparation of the report: Lucille Koval, Louise Forney, and Betty Maupin. Betty Maupin and Louise Forney also assisted in other phases of the study.

II. OVERVIEW OF DAY CARE

The main purpose of day care regulation is to safeguard children by requiring those who provide part-time care for children to meet a set of minimum standards. Standards specify a set of conditions which are sufficient, in theory, to guarantee the safety, health, and personal well-being of the child. A good day care licensing program provides reassurance to parents that their children will receive a certain minimum level of care and will not be neglected or abused.

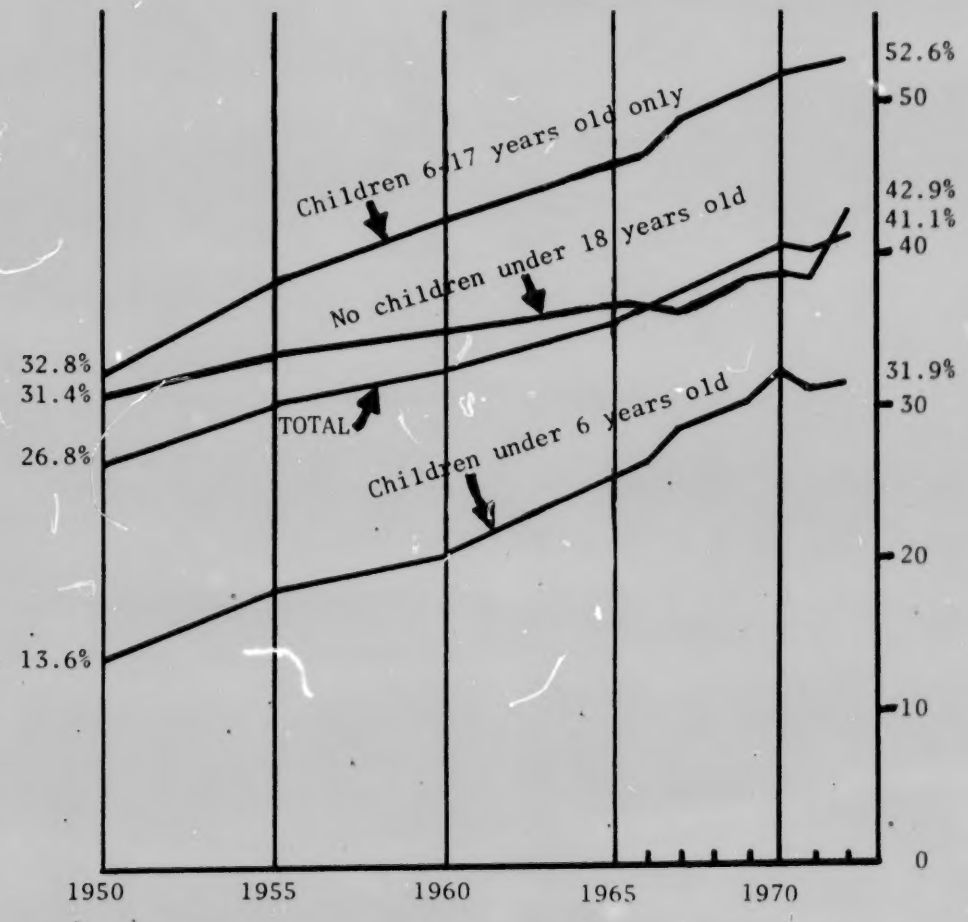
The provision of day care services has increased greatly within the last decade due to several factors including: rising participation in the labor force by mothers of young children; federal funding of child care in conjunction with poverty and manpower training programs; and national day care advocacy efforts by child welfare and womens' organizations. This chapter will present a brief review of factors contributing to the current demand for day care services.

Need for child care services. Employment statistics confirm the fact that an increasing number of women are currently entering the labor force, as has been the trend since 1950. In 1972, 40% of women who had ever been married were in the labor force; in 1950 only 26% were (see Figure II-1 and Appendix II-1). An increasing proportion of these working women are mothers with children under 18. As living costs rise, this trend can be expected to continue.

In 1970, the Westinghouse Learning Corporation carried out a nationwide survey of 1812 parents of families with children under 11 and annual incomes of less than $8000. Twenty-five percent of these were households with working mothers. Although nonworking mothers were not asked specifically about current day care arrangements, 16% of them said they had quit work because child care was either unavailable or unsatisfactory.

The Westinghouse Study documents the need for day care among working mothers. The study found that 37% of their children under six were cared for outside the home by an unrelated person or were in a day care facility. Seven percent were cared for in the home by an unrelated person. Of the working mothers of preschool children who said they needed a change in their present child care arrangements, over 60% desired a change to a day care facility. Figures such as these indicate that the need for day care services is likely to increase as the pertentage of working mothers increases.

Figure II-1. Labor Force Participation Rates of Women: 1950-1972 by Presence and Age of Children



Note: Percent of civilian noninstitutional population. Includes women who are married, separated, widowed or divorced.
Data for 1950-67 include women 14 years old and over; data for 1968-1972 include women 16 years old and over.

Source: Executive Office of the President: Office of Management and Budget, Social Indicators, 1973, p. 142.

Day care concern at the federal level. Several legislative enactments in recent years have encouraged the expansion of child care services. The 1962 Public Welfare Amendments to the Social Security Act first authorized federal grants-in-aid to State welfare agencies for the provision of day care services, with the stipulation that such facilities be licensed by the State and that priority be given to children from low income families. The 1967 amendments to the Social Security Act required that child care services be provided for participants in training or employment programs. The Economic Opportunity Act of 1964 provided direct financial assistance to day care programs under the Headstart program.

At Congressional initiative, the Federal Panel on Early Childhood was created in 1968 to coordinate federally funded child care programs. One result of the Panel's efforts was a document entitled Federal Interagency Day Care Requirements, which established minimum standards to be met by day care programs before they could be eligible for federal support. This document was widely used by states, including Illinois, in developing their own standards.

By 1970, some organizations and individuals began taking the position that day care services should be expanded and upgraded; that day care should be available to middle as well as low income families; and that what was needed was a national program which would include provisions for both child care facilities and child development programs.

Partly as a result, in 1971 the Congress passed a bill amending the Economic Opportunity Act of 1964 including a provision for the expenditure of $2 billion for expanding child care services. The President vetoed the bill, citing that section as "the most deeply flawed provision of this legislation" due to "fiscal irresponsibility, administrative unworkability, and family weakening implications . . . ." At the time of the veto, several other major pieces of day care legislation were under Congressional consideration, but as of August 1974 none had yet passed.

While Congress considered child care legislation, the Department of Health, Education, and Welfare tried to work within the ambiguities of the 1968 Requirements to resolve conflicts between federal standards and existing State standards. HEW's studies of State standards resulted in a 1971 publication entitled State and Local Day Care Licensing. HEW did not complete the drafting of model statutes and standards until Spring 1974.

The Illinois day care situation. At the 1971 Governor's Conference on Day Care, Governor Ogilvie noted that many AFDC mothers who wanted to work were unable to, due to the lack of day care services. He said that for the quarter ending in June of 1971, the Illinois Department of Public Aid showed that 43% of all persons who had wanted to participate in the Work Incentive Program were determined "not appropriate" specifically because child care was unavailable to them.

The 1970 Census showed that a high percentage (43%) of Illinois women,--many of them mothers--were in the labor force (see Appendix II-2). The extent of need for child care facilities in Illinois is similar to that at the national level, with the dense urban areas of the state showing the greatest need. The National Council of Jewish Women's study, Windows on Day Care, reported that "Chicago . . . faced a major day care shortage." The study said that there were 700 preschool children without day time supervision while mothers worked, 15,000 "latch-key" (unattended) children age 6 to 13, and 9000 children (mostly under the age of 12) in the care of relatives who were themselves less than 16 years old.

The 1970 Census shows that about 10% of the families in Illinois are headed by women (see Appendix II-3). Of these nearly 300,000 families, about three-fourths include children under the age of 18. Presumably, these families are among those in greatest need of day care.

In FY 1970, the State of Illinois expended $975 thousand on day care regulation; in FY 1971, $1.2 million; in FY 1972, $1.4 million. Currently there are 6660 licensed day care facilities serving approximately 120,000 children. Fees charged by licensed day care facilities in Illinois total about $100,000,000 per year. The total cost of day care services in the State is undoubtedly much higher.

Illinois child care legislation. Since 1933, when the Placement of Children in Homes Act was passed, the State has been involved in inspecting and licensing child care facilities. In 1957, the Illinois Child Care Act was passed, and in 1963 the Department of Children and Family Services (DCFS) was created. The most recent enactments which authorize the provision and regulation of child care services and facilities are a 1967 act which entrusts the Department of Children and Family Services with the coordination of all day care activities, including grant-in-aid distribution, and the Child Care Act of 1969.

The Child Care Act of 1969 defines the types of child care facilities, using the term "facility" to specifically mean any person or group of persons who cares for one or more unrelated children. A day care center is defined to be any child care facility caring for more than 8 children; while a day care home is a family home in which no more than 8 children are cared for, including the family's own children under the age of 18. According to DCFS regulations, if one or more unrelated children spend a total of 10 hours in any home on a scheduled basis, the home must have a license. The Child Care Act defines other types of facilities such as night-time centers, group homes, institutions, and foster homes.

DCFS licensing responsibility. The Act stipulates that no day care facility may operate without a license and that only those facilities which "reasonably" comply with standards set by DCFS will be issued a license. The remaining sections of the Child Care Act are concerned

with the licensing process, the requirements for operators[1] of child care facilities, license revocation procedures to be followed if a facility fails to comply with standards, etc.

In the 1967 Act DCFS was authorized "to administer the 'Child Care Act'[2] and such other responsibilities pertaining to children as are delegated to the Department by statute." One purpose of this report is to determine whether the Department's current day care licensing program is effective in achieving the ends prescribed by statute.

Day care licensing and regulation are not the only responsibilities of DCFS, which must also attend to such matters as adoption, protective service and foster care. The Department budget reflects its diverse activities, and, in fact, day care licensing constitutes less than one percent of the Department's total budget.

Other State agencies are also involved with day care. For example, some day care facilities serve children with special needs and are eligible for funding from the Department of Mental Health (DMH). Also, DMH and OSPI are involved through purchase of care contracts and direct subsidies to centers, which they may visit for consulting and inspection purposes. In addition, the State Fire Marshal is required by statute to make biennial inspections of licensed centers.

Day care homes and day care centers. Many sections in this report will be divided into two parallel parts--one for day care homes and one for day care centers. These two types of facilities have separate standards. In some areas of the state, separate licensing personnel were assigned to each.

Data from our surveys indicates that day care homes are not significantly different from centers in the average length of time a child remains enrolled in the home or center and the average weekly fee charged for a full-day child.[3]

However, the differences between the two types of facilities far outweigh the similarities. Surveys of day care facilities conducted by the IEFC staff indicate that on the whole, day care homes care for an average of 4.9 children. For day care centers, the average total number of children cared for (including part- and full-day children) was 50.5,

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[1]Throughout this report the term "operator" will be used to identify directors of day care centers and mothers in day care homes.

[2]Child Care Act of 1957, superseded by the Child Care Act of 1969.

[3]Data from our survey responses reveals that the average weekly fee charged for a full-day child was $19.92 for homes and $[illegible].61 for centers. These figures appear to understate the actual fees. While facilities which charge no money were excluded from the calculations, there was no way to exclude those run on a subsidized basis which charge a low or nominal fee.

with enrollments ranging from 9 to 473. Typically, the day care home mother was the only caregiver in a home, while for centers the average number of full-time equivalent staff (excluding the director) was 6.4.

A more important difference than size in the view of both operators and parents is the type of experience afforded children. There is a consensus among day care home operators and parents that a home, in contrast to a center, is more "homelike" and less of a "classroom." A typical activity in a day care home might consist of the child participating in some household activity with the mother, such as baking cookies or accompanying her on a trip to the store. In response to a question on an IEFC staff survey about why they chose a day care home rather than a day care center for their children, the largest number of parents (31%) said that day care homes provided their children more personal attention and more individual care. Sixteen percent said the homes had a more "informal," "homelike," or "natural" atmosphere.

Most day care center operators differentiated centers from homes by emphasizing the centers' programs, which usually have preschool and early childhood education overtones. The opportunity to learn social skills was also frequently mentioned. Such perceptions were generally shared by day care center parents. The most frequently stated reason (43%) for choosing a day care center rather than a day care home for their children was that the center provided more learning and intellectual stimulation, and more of a preschool environment. Also frequently mentioned (23%) was that day care centers provide a child with the opportunity to interact with other children and develop peer relations.

Our survey also revealed some differences in the willingness of day care home and center operators to accept special types of children. These are presented in Table II-1.

Table II-1. Percent of day care home and center operators reporting that they accept special types of children.

Children Accepted	Day Care Homes	Day Care Centers
Children under 2	85%	9%
Severely physically handicapped children	14	20
Mentally retarded children	21	31
Emotionally disturbed children	23	40

Because of the overall differences between day care homes and centers, it appears reasonable to employ different licensing procedures and standards for each. Wherever needed, subsequent sections of this study will also accord them differential treatment.

Role of operators. At the time of the IEFC surveys there were 4,831 operators of licensed day care homes and 1,823 operators of licensed day care centers in Illinois. The Child Care Act of 1969 places certain responsibilities upon these operators. They should be willing to "reasonably" comply with the standards set forth by DCFS. If an operator is found not to be in compliance with standards, the Department has the authority to revoke her license, subject to judicial appeal.

Day care operators and their staff are those individuals most directly responsible for the quality of care provided. Because of the important role of operators, their viewpoint has been included throughout the report.

Day care center staff. At the time of this survey, there were approximately 11,750 staff serving as child care workers in State-licensed day care centers. They are the direct providers of care to children. If it is assumed that a typical two-year old child spends 8 1/2 hours per day, five days per week, in a center and is awake 12 hours per day, then a center staff member would spend as much time as the parents would with that child during his or her waking hours. Therefore, the viewpoints of day care center staff are also considered in subsequent sections of this report.

Role of parents. At the time of our surveys, approximately 86,000 families had placed their children in licensed day care facilities in Illinois. Parents potentially play an important role in the monitoring of day care facilities. Conscientious parents will attempt to select a responsible person who will provide good, safe child care. Such parents can be expected to monitor the care given in a facility in which their child is enrolled. However, careful selection of a day care facility is often constrained by factors such as lack of time, lack of money or lack of transportation. Also, in some cases, the parents may have great difficulty making any child care arrangements at all and will settle for what is immediately available. The role of parents in the monitoring process will be considered at various points in the report.

III. ORGANIZATION AND PERSONNEL

For a day care licensing program to be effective, responsibility for the program should be clearly defined at all organizaitonal levels, and the administering agency should have sufficient manpower and financial resources to do the job. This chapter will present a brief description of the DCFS organization structure for day care licensing and regulation. This description is complicated by the fact that a reorganization of the department during the course of our study caused substantial changes in the day care licensing system. Some of these changes are incomplete at this time, and the stability of others is in question. The chapter will describe the system as it exists at present and identify those characteristics of the system which are still in flux. Appendices III-1 and III-2 show the old and new organization charts.

Following the description of administrative organization, the chapter proceeds to a description of the personnel involved in the licensing system--their personal characteristics, workloads, training, and job-related perceptions. It concludes with recommendations for improved organizational structure, better goal definitions and increased training of licensing personnel.

The discussion is based primarily upon information supplied by licensing personnel in written responses to an IEFC survey and in personal interviews. Information gathered in meetings with Department administrators is also employed.

Organization for Licensing

Primary responsibility for day care licensing in Illinois rests with DCFS. For purposes of administering all department operations, the state is divided into fourteen[1] "areas" administered by particular area offices. These are being supplemented by several field offices per area as well as 25 satellite offices. The satellite offices will be open part-time and will be used primarily for interviewing DCFS clients. A total of 107 offices will have been established when reorganization is complete.

Each area is headed by an area administrator, who has considerable autonomy but is responsible to the DCFS central office. Area administrators, and the DCFS central administrators to whom they report, are responsible for all DCFS programs and are not specialists in day care.

Office of Child Development. Within the central DCFS administration, the Office of Child Development (OCD) is supposed to coordinate the day care licensing process. OCD was created during the 1974 reorganization

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[1]This counts the Chicago area once even though there are four separate area offices established in Chicago.

through a restructuring of the Office of Community Development. ODC has offices in Springfield and Chicago. Its head reports to the Deputy Director for Program Services (see Appendix III-2).

The primary functions of OCD are: (1) develop a comprehensive day care plan for the State, (2) evaluate the operation of the State funded day care centers, (3) oversee the licensing of day care facilities, and (4) provide technical assistance and resource development to day care facilities.

The first task was delegated to DCFS in 1969 by statute. Within DCFS, the Office of Community Development was assigned responsibility for developing the State plan but apparently did not begin to do so in the five years from 1969 to 1974. ODC officials report that they are "now attempting to structure a plan which will be more formalized than what has existed during previous years."

The second function involves sending evaluators from the central office to visit the 94 DCFS-funded centers and over 100 additional centers receiving federal funds administered by DCFS. Such visits in the past were separate from visits by regular licensing workers from area offices.

The third function, overseeing licensing, is currently being addressed primarily through the revision of day care home and center standards. A discussion of this project is presented in Chapter IV.

The fourth task assigned by OCD involves the coordination of efforts to develop high quality day care resources. DCFS workers had previously provided technical consultation to individual facilities by request. However, OCD will attempt to coordinate this service and focus its development efforts, first of all, on day care facilities which serve DCFS clients.

While the Springfield OCD office is primarily administrative, the Chicago office is basically operational. It was set up as a pilot project to undertake the functions mentioned above. This office currently has a professional staff of 35. Nine of these serve as a resource development team working with DCFS-funded day care facilities. The other 26 workers were added in March 1974 when the entire Chicago-area day care licensing unit was transferred into OCD. Thirteen workers license day care centers exclusively while thirteen others license only day care homes. Foster and adoptive homes are licensed by other staff in each of the four area offices in Chicago.

Status of day care licensing within DCFS. Perhaps even more important than the location of the day care licensing function in the formal DCFS administrative structure is the informal status which it is accorded at all levels of the agency. A frequent complaint among licensers was

that, compared to other agency services, day care licensing is given a low priority. In this regard, a top-ranking DCFS official told us that up to now the Department's leadership has been so preoccupied with other problems that it has devoted little or no attention to day care.

Many day care licensers felt that they were held in low esteem by other direct service workers as well as by administrators. Also, 85% agreed that the DCFS central administrative office should make a greater effort to keep day care workers informed of agency policy, and 78% felt that area administrators should make a greater effort. Appendix III-3 presents additional data on licensers perceptions.

IEFC field work suggests that licensers' perceptions are at least partly accurate. For example, one area administrator told us, "Anybody can license a day care home. There's nothing to it." The most frequent complaint among licensers had to do with resource allocation, especially staffing. They felt that workloads were too high and paperwork demands too heavy to permit effective licensing performance. Chapter VII will present data on this question.

At the outset of this study, the IEFC staff encountered difficulty in identifying central office administrators who were knowledgeable about the structure, goals and activities of the day care licensing program. In fact, initially no administrators could tell us how many personnel were involved, or even what the day care licensing procedure was. In general, it can be said that the status of this function within the Department is not high.

The lack of status accorded licensing, coupled with the formal DCFS administrative structure suggests that part of the problem may be caused by departmental administrative organization. There is effectively no separate division or section for licensing in the central DCFS administrative office. There is a "licensing services specialist," not within OCD, who serves as a technical consultant to local offices, but she does not have formal authority over any part of the licensing program.

Lack of coordination. The need for overall administrative authority for the licensing program was recognized by licensing personnel. In the IEFC staff survey, 88% of licensers agreed that a statewide coordinator was needed. However, OCD--which has shown the same lack of initiative toward day care licensing as the DCFS central office generally--does not seem to be meeting that need at present.

OCD has the potential for becoming the central coordination office for day care licensing and development throughout the state. However, it operates with several handicaps. First, in all areas except Chicago, OCD's authority is superseded by that of the area administrator.

Moreover, licensing workers do not have a clear understanding of the role of OCD in licensing. During the IEFC survey in March, day care workers were asked whether they agreed that licensing should be placed under OCD. About 52% agreed that it should. However, 23% said they could not respond because they did not really understand what the Office of Child Development was. The OCD director has since sent memos to the area administrators in an effort to clarify misconceptions.

When IEFC staff visited the Chicago OCD several weeks after it opened, the office seemed beset with many problems. Due to a staff shortage, two workloads of over 100 day care homes each were not being covered at that time. Moreover, workers were occupied with an investigation of an infant death which had occurred recently in a licensed day care home. By June, however, the Chicago OCD had solved some of these problems. OCD had been given permission to hire six more staff for the Chicago office, and the day care home where the death occurred had been closed by court order. Chicago workers and the OCD assistant administrator seemed content with the new arrangement and confident that the office was functioning effectively. The establishment of direct lines of command for the Chicago office seems the one concrete benefit of the creation of OCD.

Licensing Personnel

In order to obtain information on the composition of the day care licensing staff, the IEFC staff conducted personal interviews with about 70 day care licensers in March 1974. The majority (90%) of this sample were experienced and had been involved with day care licensing for more than a year. Licensing staff responses to selected survey questions are shown in Appendix III-4.

Characteristics. Based upon information collected during our survey, we found the following characteristics of Illinois day care licensing workers:

94% were women;

over 75% were married;

65% had children of their own; and

over 25% had placed their children in day care facilities at some time.

The average age was 38. About 42% had been doing day care licensing for more than five years, and 50% had been with DCFS for at least five years. Ninety-one percent were college graduates, and 50% had taken postgraduate work. On the average, center licensers were older, had more education, and had been in licensing and in DCFS longer than home licensers.

Depending upon educational background and experience, a person who does licensing may hold one of three different job titles: Child Development Aide, Day Care Licensing Representative, or Social Worker. The level at which a person is placed within a particular title is determined by his qualifications and may be upgraded with additional job experience or by passing a qualifying examination offered by DCFS.

About 4% of the licensing personnel with whom we spoke were Child Development Aides I, II, or III; 43% were Day Care Licensing Representatives I, II, or III; and 44% were Social Workers I, II, III, or IV. Even though nearly half were classified as social workers, only five individuals actually had a degree in social work.

Salaries vary, of course, with job titles, ranging from about $400 to more than $1400 per month, with the average being about $900. Based on our survey of other states, Illinois' salaries are about average.

Types of Licensing Staff

Day care licensers may be divided into three groups: those who work only with day care homes, those who work only with centers, and those who work with both. Such distinctions arise from the fact that, prior to reorganization, the usual practice in district offices had been for licensing staff to work with either homes or centers exclusively. In some offices, notably Springfield and Marion, staff were assigned a workload including both homes and centers. These three groups comprise the direct service licensing workers.

Licensing supervisors were formerly assigned to supervise licensing workers in most offices. The supervisors typically did not have a workload but assisted in special situations such as problem cases. Under the current setup, licensing coordinators retain supervisory responsibilities and carry a small workload.

The exact functions of licensing supervisors and coordinators are not clearly defined. Licensing supervisors and coordinators themselves were unable to specify their exact duties and responsibilities. Accordingly, we were unable to assess their effectiveness. It is recommended that DCFS clarify the functions of coordinators and establish a procedure for evaluating their performance.

The licensing task. The Child Care Act states that DCFS "shall offer consultation . . . to assist applicants and licensees in meeting and maintaining minimum requirements and to help them otherwise to achieve programs of excellence related to the care of children. . . ." Prior to 1974, each licensing worker was expected to perform both a regulatory and a consultative function. That is, the licenser not only had to enforce the standards but also had to provide advice and assistance to operators who requested it. Continuing controversy within DCFS focused on the potential conflict between these two roles. It was argued by some that a licenser's efforts to be a helpful consultant might make her less objective and less willing to enforce standards.

Accordingly, in January 1974, DCFS formally separated resource development from licensing. Two teams--a licensing team and a resource development team--were created in each area. The licensing teams were to license and monitor all types of child care facilities--foster homes and adoptive homes as well as day care homes and centers. In essence, licensing was restricted by the restructuring just to its regulatory function. A DCFS memorandum said "licensing staff . . . consultation is to be limited to interpreting minimum standards. . . ."

There is some doubt about the efficacy of the 1974 task restructuring. First, the new structure may have fostered dissatisfaction among licensing representatives. Many of them told IEFC staff that the consultative aspect of their jobs was the most enjoyable. They indicated that their job satisfaction and morale would be adversely affected if they lost that role.

Several licensing staff transferred to resource development teams during reorganization. Others, who stayed in licensing, told us they would continue to provide consultation on program improvement to homes and centers in their workload. They felt that the resource development teams would be unable to provide services to all licensed day care facilities, due to manpower shortages or competing priorities such as foster and adoptive homes. In fact, some offices with only two or three resource development staff are responsible for serving several hundred adoptive and foster homes as well as several hundred day care homes and centers.

Secondly, licensing and consultation activities may not be entirely separable. This involves the nature of the difference between consultation on "interpreting minimum standards" (DCFS' definition of the licenser's job) and "consulting and provding assistance in program development" (DCFS' definition of the resource developer's job). The distinction is especially unclear in interpreting such general standards as "provides an opportunity for growth in physical, social and mental development."

Perhaps due in part to such problems, DCFS told us in July 1974 that the separation of resource development from licensing has been partially rescinded. Licensers will again be allowed to provide consultation on program development and improvement where needed. This is in conformity with the HEW guidelines for day care licensing, which state, "Responsibilities of licensing staff should include . . . ongoing supervision of licensees and consultation to individual programs on the establishment and improvement of services to children." Also, 34 out of 42 other states indicated it is part of the official role of day care licensing staff to consult with licensees to assist them in improving programs beyond minimum standards.

Despite the fact that the separation seems to have been partially rescinded, the restructuring still means that licensing team members will carry what DCFS calls a "generic" caseload. That is, they will be licensing and monitoring all types of child care facilities (except in Chicago, where there are so many child care facilities that specialization was retained). Generic caseloads present several difficulties. For example, both team coordinators and licensers experienced with a particular type of facility will require considerable training in order to deal competently with the new types of facilities in their caseloads.

In addition, the evident indecision of the DCFS central office about the licensers' role has given rise to confusion and morale problems among licensers. In interviews with IEFC staff, a number of them expressed resentment toward the changes in the licensing task.

Department officials, especially area administrators, should be sensitive to these problems and take steps such as those suggested later in this chapter to see that personnel understand their new responsibilities. Also, continuity in central office policy toward licensing would probably help to reduce dissatisfaction among licensers and help retain qualified personnel.

Workloads. The number of personnel involved in day care licensing in January of 1974 (prior to reorganization) was about 72. Not all of these persons were doing licensing full-time; some performed other departmental functions such as adoptions or protective services to families (see Appendix III-5). To correct for this, the number of "full-time equivalent" (FTE) staff was estimated, based on the percentage of time each worker spent in licensing day care facilities.

During the first half of 1974, six staff were added in the Chicago area and several licensing personnel changes were made in other area offices due to reorganization. By June, there were 76 licensing team members and coordinators (49.4 FTE).

The change in the number of FTE staff differs between licensers of homes and centers. Table III-1 shows that after reorganization

the number of FTE center licensers decreased slightly, while the number of homes licensers increased. This was due primarily to the addition of five home licensers in Chicago.

Table III-1. Change in full-time equivalent day care licensing staff during 1974.

	January	June	Change
Licensers for Homes	21.7	26.7	+5.0
Licensers for Centers	23.0	22.7	- .3
	44.7	49.4	+4.7

Based on the number of licensed day care facilities reported by DCFS, an overall FTE staff/facility ratio was calculated to be one FTE worker for every 135 licensed facilities. For homes, the ratio was one FTE worker to every 181 homes, while for centers it was one to 80.

These ratios may be compared to those calculated for other states based in IEFC survey data. The overall FTE staff/facility ratio for other states ranged from 1:23 to 1:267. Of the 43 states responding to the survey, only three states (New York, Iowa, and North Carolina) had more facilities per FTE staff than Illinois. Similarly for centers, there were only three states (Arizona, Maine, and Washington) which reported ratios higher than Illinois'. For homes, no states reported having a higher staff/facility ratio.

In March 1974, licensers were asked about the number of licensed day care facilities currently in their actual workloads. Full-time day care home licensers reported that their workloads ranged from 103 to 375, the median number being 148 licensed homes per worker (half had more, half had fewer than 148). For full-time center licensers, actual workloads ranged from 52 to 125, with a median of 88.

In June 1974, licensing coordinators were contacted by phone to determine how workloads had changed due to reorganization. Under the new licensing structure, teams ranged in size from three to six members (except in Chicago where nine licensers were assigned to day care homes and 13 to centers). The team coordinators carry a small workload of 20 to 30 licensed facilities and devote the rest of their time to supervision. An average workload per team member (excluding coordinators)

was calculated, based on the total number of licensed facilities for which the team is responsible (including day care homes and centers, foster and adoptive homes). These average workloads ranged from 70 to 589, with the overall average being 237 licensed facilities per team member. Appendix III-6 shows the average workloads for each area office.

While care must be exercised in making such comparisons because of a diminished consultation responsibility, in general, licensers' workloads appear to be increasing as a result of reorganization. As further discussed in Chapter VII, heavy workloads tend to decrease the effectiveness of licensing staff in monitoring day care facilities.

Paraprofessionals and volunteers. One alternative which might help ease the manpower situation is the use of paraprofessionals and volunteers. Several central office administrators told us that DCFS would like to use more volunteers and paraprofessionals in the day care licensing program. At the time of our surveys, at least five local offices used volunteers. In at least one office, volunteers were used to do all types of day care licensing, including initial studies, interim visits, and relicensing inspections.

Typically, paraprofessionals do not meet the educational requirements of licensers since they are not required to have a B.A. or even a high school diploma. However, they are occasionally used for home licensing because it is believed that does not require as high a degree of professionalism as center licensing. Volunteers, on the other hand, are more likely to meet the formal qualifications for licensers but prefer to work part-time without pay. The main advantage of both types of nonprofessionals is their lower cost. In addition, they may be uniquely familiar with local needs and resources.

However, a number of licensers feel that the use of nonprofessionals downgrades the licensing job. Only one-fourth of licensers favored the use of paraprofessionals in licensing centers, while 74% favored their limited use in licensing homes. Many licensers who favored the use of paraprofessionals said they should act only as assistants to the professional licenser. Moreover, many operators told us they would resent being evaluated and licensed by a nonprofessional.

Besides the resistance of operators and professional licensers, there are a number of other disadvantages to the use of nonprofessionals as licensers:

existing problems of nonuniformity in applying standards (see Chapter V) would be likely to increase;

higher turnover, especially among volunteers, would lead to increased training costs and lack of continuity; and

it is unlikely that enough could be recruited to replace a significant number of professionals.

This does not mean that there is no place for nonprofessionals in the licensing and regulation process. They can be valuable in assisting professionals by helping with paperwork, handling citizen inquiries and so on. Chapter IX documents that unlicensed facilities, notably homes, represent a serious weakness in the current system. Thus, locating and contacting unlicensed facilities is one area in which volunteers might be particularly useful because of their familiarity with the community.

It is recommended that, before nonprofessionals are used extensively in any direct phase of the licensing process, a pilot project be undertaken to determine their effectiveness and usefulness.

Training and development. Day care licensing personnel have entered licensing from a wide variety of educational backgrounds. Few entered with social work degrees; more had education or social science degrees. Some had worked in or operated day care facilities and programs. Their diverse backgrounds may have afforded opportunities for working with children, but the knowledge and training enabling them to license and advise day care facilities had to be acquired on the job.

During the IEFC survey, licensers were asked what training they had received before being allowed to license facilities on their own. About 20% responded that they received none. For the rest, a typical "training procedure" reported was that they were simply given a copy of the standards and told to read it. Some 20% reported having been told about licensing procedures in conferences with supervisors. About one-third said they had made joint visits to day care facilities with experienced licensing personnel. Only four licensing workers reported they had some kind of extended training experience; specifically mentioned were special training sessions in the Springfield DCFS central office, a three-week training course at the University of Illinois, and special training with a regional licensing consultant.

When asked whether they were satisfied with the training they had received, 58% said yes and 42% said no. Many who said that they were satisfied explained that they had prior child care experience and thus believed they needed less rigorous training. Nevertheless, almost all licensing personnel indicated that they would like to receive more training in one or more particular aspects of their jobs, specifically:

child development	61%
fire hazards and codes (State and local)	46
interpretation of standards	43
development of a day care home/center	41
building codes (State and local)	35
public health matters, communicable diseases	35
other	26

Of the licensing personnel who responded "other," the items most often mentioned were legal procedures, business administration, and finance related to child care facilities. Also mentioned were community relations, techniques for dealing with troublesome operators, and child care needs of exceptional children (physically handicapped, emotionally disturbed, etc.).

Based on the requests of licensing staff and on findings which will be presented throughout this report concerning inadequacies in the present licensing system, it is recommended that DCFS initiate training and staff development activities which focus on the licensing of day care facilities. These should be undertaken in addition to any training procedures currently practiced in area offices.

DCFS officials told us that training funds are allocated on the basis of $100 annually per employee. It does not appear that, prior to reorganization, anything like this amount was spent on training day care licensing representatives. Under the new licensing team structure, it will be even harder to determine whether day care licensers are allocated a fair share of training funds. In any case, $100 per licenser is probably inadequate, and serious consideration should be given to increasing this amount.

General Recommendations

With the reorganization of DCFS, the Department must make both licensing and resource development personnel aware of their new responsibilities. There should be a State director of licensing to coordinate and direct staff training and development. Such a person could set licensing goals and policies, direct program analyses, strengthen community support, and make decisions about license issuance, denial, continuation, or revocation in problematic cases. Establishment of this position would make it possible to clearly assign accountability for program performance.

In addition, a systematic training procedure for licensers should be implemented, and licensing staff should pass a written test on licensing standards and practices before being allowed to perform licensing functions. Periodic regional or statewide meetings of day care licensing staff should be held to develop communication between different offices about licensing methods and practices. Workshops on special topics such as fire or health standards could be held at such meetings. Such meetings were apparently held on a statewide basis several years ago.

The current licensing services manual is out of date, and a new one should be developed. It should devote considerable attention to the interpretation and application of standards from the licenser's

standpoint. For example, instructions might be given on the best way to observe, measure, and judge space requirements, child/staff ratios, etc. This will be especially needed when the new center and home standards being prepared by the Standards Revision Committee are implemented.

There is a distinct need for a State day care plan, such as DCFS was instructed by the General Assembly to prepare in 1969. The day care licensing program suffers from an apparent absence of goals and objectives, and little evidence can be found of planning to provide sufficient manpower to meet the program's needs. It is recommended that the General Assembly establish a deadline for completion of a State day care licensing and regulation plan--the end of FY 1976 does not seem an unreasonable traget date. A portion of such a plan should:

(1) establish the need for day care services and for State regulations;

(2) define goals, objectives and responsibilities for the State's regulatory program; and

(3) set forth specifically the resources required to meet the program's needs.

IV. DAY CARE STANDARDS

Standards are central to the licensing and regulation function. The standards for the operation of day care facilities are intended to fill out in detail the general language of the Child Care Act and to specify what is meant by quality of care and protection of children.

Drawing on our surveys of day care operators, parents, and staff, as well as our interviews with State licensing personnel, this chapter addresses the following questions concerning the standards:

1. Are the standards understood and accepted by providers and consumers of day care services?

2. Which standards are most frequently violated?

3. Which standards seem to have the greatest influence on decisions whether or not to license a facility?

4. What changes in the standards would program participants (licensers, operators and parents) like to see?

This chapter has two major sections, the first dealing with the standards for day care homes and the second dealing with the standards for day care centers.

Standards Revision Committee. Several months after this study was initiated, DCFS received a $22,000 grant from HEW to "revise the Licensing Standards for Day Care Centers and Family Day Care Homes." A statewide committee was created for the purpose of reviewing and revising standards. This committee is composed of about fifty people from various interested professional and nonprofessional groups. Included are day care center operators and parents, child development experts, representatives of various child advocacy organizations, licensing staff members, public health specialists, and others. In order not to duplicate the efforts of this committee, our study has minimized its evaluation of the content of standards.

A brief note on the structure and activities of the Standards Revision Committee is, however, in order since that group is responsible for formulating new standards. The current effort appears to be generally following the guidelines recommended by the U. S. Offices of Child Development and Economic Opportunity in their "Models for Day Care Licensing." First, the objective of revising standards once every five years is being fulfilled. Also, the Committee appears to be developing new standards where needed and not just refining old standards, as called for in the guidelines. Furthermore, representation on the Committee is relatively diverse and represents most important groups affected by day care regulation.

However, in apparent variance with the guidelines, there are no day care home operators, parents of day care home children, nor legislative members on the Committee. Lack of day care home operator participation is also apparently at variance with the requirement of Section 7 (a) of the Child Care Act which says, "The Department shall seek the advice and assistance of persons representative of the various types of child care facilities in establishing . . . standards."

Finally, the federal guidelines suggest public hearings and community review before new standards are officially adopted. The Committee has indicated that hearings will occur. DCFS should work to assure that a broad range of interests and viewpoints are represented at them.

Day Care Home Standards

The minimum standards for licensed day care homes are published in the Department of Children and Family Services Regulation No. 5.09 (January 1, 1970). This document is 12 pages long and includes standards for personal characteristics and health of the family providing care, number of children served, child care assistants, planned activities for children, medical exams, training and discipline, and DCFS supervision. Examples of such standards are:

the home "shall be safe, clean, well-ventilated and heated";

outdoor space shall be provided for active play;

the day care parents must be "stable, responsible, mature individuals of reputable character";

children shall not be deprived of a meal as punishment, nor subjected to corporal punishment; and

the daily routine shall include opportunities for children's physical, social, and mental development.

The maximum number of unrelated children which may be served in a day care home is set by law at eight, including any of the operator's own children under the age of 18. Thus, if the day care operator had four of her own children under 18 living in the home, she could not be licensed for more than four other children. Under regulation 5.09, no more than four children under the age of six may be cared for unless the day care home operator is assisted by another person. The child care assistant must be at least 16 years old (14 when school is not in session). If the child care assistant is one of the operator's own children under 18, she must still be counted as one of the day care children. This inconsistency seems pointless and should be corrected.

Operator's children. A common complaint of day care home operators concerned the statutory requirement that the operator's own children under 18 must be counted as enrolled day care children. Many operators pointed out that 14-year olds can serve as child care assistants when school is not in session. Also, 14 is not an uncommon age for baby sitters. Seventy-nine percent felt that the age at which their own children are exempted from the count should be changed. The "exempt" ages recommended by operators are displayed in Table V-1.

Table IV-1. "Exempt" minimum age of operator's own child recommended by day care home operators.

Recommended Age	Percent of Day Care Home Operators
Under 12	15%
12	16
13	9
14	18
15	12
16	23
17	2
18	2
Over 18	3

Total number of respondents= 268 Mean age recommended= 13.6

Parents' awareness. In our survey of parents of children in day care homes, 81% indicated that they had not read the State standards. This does not mean that parents were oblivious to State regulation of day care homes--99% said that they were aware that the home in which their child was enrolled had a State license. That so few parents have read the standards may be due as much to lack of opportunity as lack of interest. Although the question was not asked on the survey form, about 5% of the parents wrote that they wanted to obtain a copy of the standards. It is recommended that DCFS make a more active effort to disseminate the standards or a summary of them to parents. This might be done by requiring home operators to give a copy of the document to parents at the time of enrollment.

Standards likely to be violated. Day care home operators and licensing staff were asked to list standards which were most likely to be violated by day care homes. Responses to this question provided an indirect measure of parts of the standards most likely to be violated. Sixty-one percent of the operators listed something in response to this ques-

tion, and most listed only one item. Table IV-2 shows the most commonly reported items. Several of these (for example, nutrition and bedding standards) were also found to be violated relatively frequently by licensing staff in the "paired-observers" study (see page 37).

Table IV-2. Standards which day care home operators and licensing staff felt are most likely to be violated in day care homes.

Violation*	Percent of Operators	Percent of Licensers
Overenrollment (exceeding licensed capacity)	26%	81%
Inadequate meals and poor nutrition	8	5
Neglect of children or lack of warm, loving care	8	**
Lack of cleanliness in home (including soiled linens and sheets, dirty floors)	6	**
Inadequate supervision	4	7
Overly harsh discipline or spanking	2	16
Incomplete medical forms	**	12
Incomplete records on children	**	12
Improper group size for special age groups	**	12

*includes the five most frequently reported by each group; for a complete list, see Appendices IV-1 and IV-2.

**not among the 15 most frequently reported by this group.

Obviously, the item most frequently mentioned by both groups was overenrollment. Many operators said that they knew personally of day care homes which were exceeding their licensed capacities. A common theme in these responses was that the overenrolled home operators were mainly motivated by profits, and not by the welfare of the children. Similarly, many of the people who listed neglect of children or lack of warm, loving care as frequently violated standards cited preoccupation with money as a determining factor.

Some operators' responses to this question focused on the fact that many day care homes operate without a State license in violation of the law. For example, a dozen answers mentioned that one of the most frequent violations was operating without a license.

Suggested changes. Day care home operators were also asked to suggest changes or revisions in current licensing standards. Only 5% responded to this request. No one suggestion was made by as many as 1% of the overall sample of home operators. Some of the suggestions were:

require a set number of outings in good weather;

do not require physicals of an operator's own school-age children;

strengthen the medical, cleanliness and nutrition requirements; and

require homes to have a fire extinguisher.

Only 3% of the sampled parents of children in day care homes responded to the same request for suggested changes in the standards. This is not surprising since few parents had read the standards. Some of the parents' suggestions were: lower the limit from 8 for the number of children a home operator can care for; place more emphasis on child development and programming in the standards; and place more emphasis on the personal characteristics of the operators and staff.

Importance of individual standards in the licensing decision. A case could be made that since adherence to the standards is required by law, all of them are important. However, some professionals in the area of children's services and child welfare have argued that factors such as enrollment, child/staff ratios, and the quality of care given in a home are more important than considerations such as adequacy of records.

Our study has generated some data which shed light on the question of which standards seem to be closely associated with the decision to license a day care home. Using data from the "paired-observers" study it was found that six items correlated significantly and positively with the licensing decision (see Appendices IV-3 and IV-4). The six are:

adequate number of single beds or cots;

rubber or plastic sheets provided for children under three years old;

three references supplied for the day care home operator;

name of responsible person, address and phone number available in case of emergency or illness of operator;

operator has a specific plan for handling injury or illness with day care children; and

operator has home insurance which covers day care children.

In other words, compared to all other items, when any of those six were found to be in noncompliance, the licenser was more apt not to issue a license. It cannot be said flatly that these items alone determine the licensing decision, but these are the items which discriminated best statistically between decisions to license or not license a day care home.

Finally, it should be noted that neither the Child Care Act, the standards, nor DCFS regulations provide a clearly specified policy on the number or type of violations of individual standards which provide sufficient grounds to deny a license. In the paired-observers study, it was found that in each of 75 inspection reports there was at least one noncompliance noted, yet only seven of the 75 stated a decision not to license the home. Homes which were recommended for a license had an average of 4.7 noncompliances, while the average for homes which were not recommended for license was 6.3. The difference was not statistically significant. This suggests that there is a need for clearer guidelines in deciding whether or not to license a facility, a point which will be pursued further in Chapter VI.

The dividing line between homes and centers. The Child Care Act sets the dividing line (in terms of the number of children cared for) between day care homes and centers at 8. That is, a day care home is a facility which cares for 8 or fewer children, and a day care center cares for more than 8 children. Fifty-four percent of day care home operators and 38% of the day care center operators felt that this dividing line should be changed. The average numbers recommended by operators of homes and centers were 7.1 and 6.8, respectively (see Appendix IV-5 for more detailed statistics). Also, the majority of other states set the maximum number of children for a family day care home at less than eight.

It might be advisable to change the dividing line to 7 (i.e., homes to care for 7 or fewer children; centers for more than 7 children). Such a change might be acceptable to a larger percentage of day care home operators if at the same time the "exempt" age for day care home operators' own children (see p. 27) were also lowered to 14. This would then be consistent with the minimum age for a child care assistant. If the Standards Revision Committee believes these changes are appropriate, it should recommend the necessary legislative action to the General Assembly.

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Day Care Center Standards

Center standards are published by DCFS in Standards for Licensed Day Care Centers and Night-Time Centers, issued September 1, 1971. This 76-page document contains both required minimum standards for licensing and suggested standards which are not required for licensing. Some of the areas covered in the day care center standards are: the organization and administration of a center, personnel qualifications, physical plant and equipment, program for children, services for special groups (e.g., mentally retarded, infants), health and medical care, food and nutrition, transportation, and records and reports. Examples of minimum standards are:

> "hot and cold running water shall be provided";
>
> "there shall be a minimum of 35 square feet of activity area for each child two years and older";
>
> "there shall be at least one staff member for a group of eight two-year-olds";
>
> the center shall provide "a basic program of well-balanced and constructive activities geared to the age, needs, and developmental levels of the children";
>
> "no child shall be deprived of meals or any part of meals as punishment"; and
>
> the center staff shall possess "flexibility, patience, emotional stability and moral integrity."

Licensing standards for day care centers are reviewed in detail with center operators by a DCFS licensing representative before a license or a permit is issued. As in the case of homes, most parents of children in day care centers (83%) had not read the standards. Ninety-one percent of the parents were aware that the center in which their children were enrolled had a license. Among center staff, only 22% had read the standards, but 100% were aware that the center had a license.

Again, it is recommended that an active effort be made to disseminate day care center standards to parents. DCFS should prepare a short "consumer's guide" summarizing the center standards, which the operators should be required to give to parents when their children are enrolled. Licensing representatives should make clear to operators and staff that staff familiarity with the standards is important.

Child/staff ratio. In view of the generally recognized importance of child/staff ratios, day care center operators, staff, parents and licensing representatives were asked to indicate whether the current child/staff ratio standards were satisfactory. If they felt that a particular

ratio was unsatisfactory, they were asked to designate their choice for a new ratio. Table IV-3 presents their responses for various ratios. (A more detailed version of this table may be found in Appendix IV-6).

Table IV-3. Current and average recommended number of children per staff for day care centers.

Type of Child	Current Standard	Operators	Staff	Parents	Lic. Rep.	HEW Guidelines
Infants (under 2)	6	3.8	3.7	3.5	3.4	4
Two-year-olds	8	5.8	5.0	5.0	5.2	5
Three-and four-year-olds	10	9.2	7.0	6.3	6.5	10
Five-year-olds	25	14.0	12.7	13.0	13.6	12
Mentally retarded	5	3.2	3.7	2.9	3.1	--

In each case, the average child/staff ratio recommended by program participants was lower than the current Illinois standard. (With one exception, the HEW guidelines were also lower). Operators tended to recommend higher ratios than staff, parents or licensers. This is understandable since higher ratios are to their economic advantage. Nevertheless, it is noteworthy that on average even they recommended lower ratios than the current ones. It is, therefore, recommended that the Standards Revision Committee consider lowering the current required ratios along the lines suggested in Table IV-3.

Standards violated. Day care center operators and licensing representatives were asked to indicate what standards they felt were most likely to be violated by centers. Fifty-three percent of the day care center operators answered this item. Some of the most frequently listed items are presented in Table IV-4.

As in the case of homes, day care center licensers and licensees listed several common standards which are apt to be violated. Again, the most frequently listed item--child/staff ratios being too high--was the same for both groups. In the paired-observers study, child/staff ratios were the second most frequently reported violation. Overenrollment, poor programming, meals and snacks, were also frequent violations in the paired-observers study.

Table IV-4. Standards which are likely to be violated in centers--items most frequently listed.

Type of Violation *	Percent of Operators	Percent of Licensing Reps.
Child/staff ratios too high	16%	47%
Staff poorly qualified and not well trained	9	12
Inadequate meals and poor nutrition	9	26
Overcrowding in a center, not enough space	9	**
Poor programming, lack of concern for total child development	8	29
Overenrollment	7	35
Children's medical forms incomplete	1	25

*includes the five most frequently reported by each group; for a complete list see Appendices IV-7 and IV-8.
**subsumed by licensers under category of child/staff ratios too high

Suggested changes. Day care center operators, staff, and parents were asked to suggest changes in current center standards. The percentages responding were 17%, 6%, and 2%, respectively. Operators most frequently mentioned that the requirements for staff educational background and training should be increased (6%) and that program requirements should be strongthened (2%). Again, the rather low number of suggestions for changes in the standards are not surprising for parents and staff, since so few of them have read the standards.

Importance of individual standards in licensing decisions. As with day care homes, each of the items rated for centers in an interim visit in the paired-observers study were correlated with the decision to license. More than one-fourth of the standards correlated significantly with the licensing decision. These are presented in Appendix IV-3.

Most of the significant items deal with health, safety, and recordkeeping variables. As with day care homes, several of the items which operators and licensing representatives said they believed were frequently violated in centers significantly correlated with the actual licensing decision as revealed in the paired-observers study. Thus, noncompliance on child/staff ratios, overenrollment and overcrowding were more likely to be associated with a decision not to license. Given the large number of items which correlated with the licensing decision, it might be that when a licenser saw a center as generally licensable, she rated these key factors as being in compliance. Or, if she saw certain factors such as the treatment of children to be poor, she tended to rate many other factors such as codes of safety and conditions of cleanliness as being in noncompliance.

As with day care homes, there is no set policy on the type or number of individual violations of standards which result in a negative licensing decision. In the paired-observers study there were at least two noncompliances in each of 38 reports on centers, yet only eight reports gave a decision not to renew or continue the license. There was a significantly greater number of individual noncompliances for centers when the decision was to discontinue the license. The mean number of noncompliances for centers receiving a negative decision was 18.3; the mean for those receiving a positive decision was 6.1.

It is recommended that the Standards Revision Committee define all standards as clearly and specifically as possible. It is also recommended that the committee devote some thought to establishing a hierarchy of standards, so that licensers and operators will know which standards are to be regarded as most important. There might, for example, be three groups:

> "Group I" standards would be the most important, and violation of any one would result in denial of a license. These might include fire and safety hazards and corporal punishment.
>
> "Group II" would be somewhat less important--perhaps violations of three of these would result in denial. They could include standards relating to outdoor play, number of beds and the like.
>
> "Group III" might be primarily procedural in nature; perhaps five or six violations could be allowed. These might include children's records, medical forms and so on.

A hierarchy of standards would probably necessitate a revision of licensing appraisal forms. This idea is discussed further in Chapter V.

V. THE UNIFORMITY OF APPLICATION OF DAY CARE STANDARDS

An effective day care licensing system should be capable of applying standards uniformly across the state, consistently between different licensing staff, and consistently by the same person over time.

The word "standards" itself implies a set of criteria applied uniformly. If standards are not uniformly applied, even the most stringent and comprehensive ones may not assure adequate safeguarding of children. Nonuniform application of standards may have the effect of denying "equal protection" to day care operators if some are treated more severely than others by unique interpretations by their licensing representatives. In addition, uniformity of standards provides assurance to parents of day care children that licensed facilities throughout the state attain the same minimum levels of protection and care.

Naturally, a particular facility will change over time, but if we imagine one that did not change in any respect, uniform application of standards would mean:

(1) the same licensing representative inspecting the facility at two different times would make the same determinations about compliance with standards and the same licensing decision;

(2) two or more licensers could visit the facility together and arrive at the same conclusions; and

(3) one licenser visiting the facility at one time and a second licenser visiting at another time would reach the same decisions.

Similarly, uniformity implies that day care facilities which actually meet standards to the same degree will be given the same licensing decision and be found in violation of the same standards by a single licenser or several licensers.

"Paired-Observers" Study

Since identical or unchanging facilities cannot be found in the real world, it is difficult to test the above propositions. However, it is possible to test the uniformity of standards administration between licensers inspecting the same facility at the same time.

To make such a test, a "paired-observers" study was conducted. Under the paired-observers procedure, two licensers visited and inspected a day care facility at the same time. They made independent ratings of

compliance with standards and independent decisions on whether or not to license or relicense the facility. For day care homes, licensers served in a total of 45 pairs in this phase. For day care centers, relicensing visits were made by licensing representatives in a total of 23 pairs. Standard home and center rating forms were used by all participants. For a fuller description of the procedure for this study, see Appendix IV-4.

Table V-1 presents the licensing decision results for the day care homes and centers visited.

Table V-1. Relative frequency of licensing decision by day care homes and day care centers for paired-observers study.

Licensing Decision	Day Care Homes n = 45 pairs	Day Care Centers n = 23 pairs
Yes/Yes	74%	65%
No/No	4	9
Undecided/Undecided	4	
Yes/Undecided	11	
Yes/No	7	26

There was fairly high agreement on the licensing decision for day care home licenser pairs. If one considers only those cases where a yes or no decision was made by both persons in a pair, there was 92% agreement. It should be noted, however, that the number of negative licensing decisions about a day care home was relatively low. When one member indicated a negative decision, in only two out of five pairs did the other member arrive at the same decision

For day care centers, it can be seen that there was an overall agreement of 74% on the relicensing decision. When one member of a pair made a negative decision, the other person agreed only about one time in four. A day care center operator who had just had her license discontinued might conclude from such results that the decision might have been reversed if only a different licenser had made the inspection visit.

Individual standards. Each member of the paired-observers team was asked to rate compliance with standards using five possible responses for each standard: in compliance, not in compliance, did not observe, not applicable, and planned compliance (operator intends to comply). For day care

homes, when one person found an item to be in noncompliance, the other licenser agreed with this rating only 19% of the time. For day care centers, this percentage was 23%. About the same level of agreement could be produced by random assignment of ratings among the five categories. Random assignment would produce a 20% probability of agreement for a noncompliance.

The average number of noncompliances with individual standards was 4.8 per home and 9.6 per center. The higher number of noncompliances for centers than homes is not surprising since approximately twice as many items were examined for centers as homes.

Before licensers rated compliance and noncompliance, they had to collect certain background information on the facility. Even here, there was substantial disagreement. For example, 40% of the licensers disagreed on the number of rooms in day care homes to be used for naps and play areas. There was 13% disagreement on the number of the operator's own children who would be in the home and 20% disagreement on the number of nonrelated children to be cared for. For the last item, the licensing pair disagreed on the average by two children. This has special significance because counting children is fundamental to determining overenrollment. And overenrollment is the standard which operators and licensers agreed was most apt to be violated.

Some of the items on which licensing personnel most frequently disagreed about compliance are displayed in Tables V-2 and V-3 for day care homes and centers visited in the paired-observers study. (A complete list is given in Appendix V-1.) Many of the items showing the highest levels of disagreement refer to "tangible" standards which should be susceptible to fairly objective verification. For day care homes, such items include whether the operator has home insurance which covers day care children, whether a home has supplied appropriate personal medical information, and whether cribs are provided for infants. For centers, such items include whether child/staff ratios are appropriate, whether the center provides for special groups such as mentally retarded and other handicapped children, and whether menus are posted one week in advance.

Some authors have indicated that the relatively "intangible" standards which cannot be measured accurately--such as quality of care given in a day care facility--present a problem for uniform enforcement of standards. Some of the paired-observers data seemingly contradict this view. For items such as whether a day care home operator is: (1) "willing and able to assume responsibility," (2) "stable and mature," (3) "appreciative of the child's relationship with his own family," and (4) "warm, spontaneous, enthusiastic, and understanding of child's total needs," there was no disagreement in any pair. There was less than 4% disagreement for items such as "can exercise good judgment in

Table V-2. Percentage disagreement on compliance by item for paired-observers study--day care homes.

Item Checked on the Appraisal Form[1]	Percent of Pairs in Disagreement
Operator's insurance covers day care children.	36%
Operator requires children have contagion exam prior to placement and/or physical exam within 30 days.	33
Operator has requested from parents a list of physical limitations and special medical considerations.	33
Appropriate personal medical information has been given by operator.	31
Health requirements met by operator.	27
Three references supplied for operator.	20

1. Does not include "background" items, e.g., number of children (see text).

Table V-3. Percentage disagreement on compliance by item for paired-observers study--day care centers.

Item Checked on the Appraisal Form	Percent of Pairs in Disagreement
Child/staff ratios and groupings are maintained, as prescribed according to ages or handicapping conditions of children.	39%
Center provides for special groups (mentally retarded and other handicapped children).	39
Furnishings and toys for children are adequately supplied.	29
Menus are posted one week in advance.	26
Care is provided for individual children with special handicaps.	22
There are personnel policies and practices which stimulate good job performance.	22
Special requirements for food handlers are met.	22

caring for children," and "will train and discipline children with kindness and understanding." Similarly, only 4% of day care center pairs disagreed on whether "children are treated with kindness and understanding" and 8% disagreed on "general atmosphere during meals is pleasant, and handling of children is conducive to positive attitudes toward food." Much of this lower level of disagreement on "intangible" items may reflect lower absolute rates of violation. That is, there may not have been much opportunity for disagreement because the characteristics being rated were above average and not in question of being in violation.

Videotape Study

Was the high level of agreement about intangibles in the paired observers study in fact due to the high quality of care in the facilities visited? In order to examine this question, a separate "videotape study" was conducted, with the help of the Office of Superintendent of Public Instruction. Two home operators posed as potential applicants for a license. Each of them was filmed in a simulated initial interview with a day care home licenser, lasting about 40 minutes. Some of the operator's day care children were also present during the interview, and representative home environments were created to provide a realistic presentation. The two operators were chosen to illustrate contrasts because the licensing staff assigned to them felt that one was marginal, while the second represented a day care home of fairly high quality. The former, for example, stated on the tape that she would strike children to discipline them--despite the fact that this is a clear violation of the standards.

Forty-one licensers and supervisors watched the films and made ratings on a section of a day care home appraisal form. They were also asked to make a tentative licensing decision based on the evidence presented. No discussion was permitted before all forms were completed.

For the first operator, representing the marginal condition, there was extensive disagreement on some items. These are illustrated in Table V-4.

Thus, the videotape study shows that when there is some question about the personal characteriscics of the operator, there is a relatively high level of disagreement about the compliance status of several items relating to personal attributes of the operator and the care to be provided in the home. In addition, there was a distinct lack of uniformity among the 31 licensers who felt they could make a decision on whether or not to give the home a license. Twenty-six percent indicated that they would license the home; 74% said they would not. By contrast, nearly all the licensers who made judgments about individual items for the second videotape rated them in compliance. One hundred percent said they would license the second operator.

Table V-4. Ratings made for the first videotape (marginal condition).

Item	Non-compliance	Compliance	Didn't Observe Can't Judge
Operator is warm, spontaneous, enthusiastic, and understanding of child's total needs.	95%	5%	0%
Will train and discipline with kindness and understanding.	93	7	0
Can exercise good judgment in caring for children.	76	15	10
Is stable and mature.	73	22	2
Has an appreciation of the child's relationship with his own family.	61	15	22
Has indicated that she has read the standards for day care homes and will comply with them.	56	29	12
Is willing and able to assume appropriate responsibility.	46	49	5
Will provide daily routines and activities suitable to age.	27	44	20

Note: Row percentages do not add up to 100 for some items because two other rating categories were used but not reported here (Planned Compliance and Not Applicable).

Differential interpretation. It is clear, then, that standards relating to personal characteristics of the operator and to the quality of care are subject to fairly high disagreement among licensers. Lack of uniformity in licenser's ratings could be caused either by differences in interpreting the standards or by differences in applying standards when they are uniformly interpreted. From the paired-observers study, different responses can be seen for many items about which there should be little disagreement. For example, there was considerable disagreement on items such as the number of children and staff.

In other cases, however, licensers seem to be interpreting the standards differently. To test this, a short series of written questions about center standards was administered to center licensers. The questions were constructed directly from the standards and were chosen on the basis of ambiguity in the standards. Licensers were encouraged to refer to the written standards while answering the questions.

Each question was answered either "yes" or "no." The results show several areas of disagreement about the meaning of standards. For example, for 31 respondents there was no unanimous agreement on any of the 22 items. Some of the items and responses are presented in Table V-5.

Thus, it seems that at least part of the lack of uniformity in applying the standards is the result of varying interpretations about what the standards mean. Some of the items tested for the interpretation may seem inconsequential; however, they should be clearly defined if they are to be written into the standards to serve as criteria for granting or refusing licenses.

In any case, on the basis of these findings, it is recommended that special attention be given to homes and centers which are borderline with respect to licensing status. In such cases, it might be advisable to send out more than one licenser to make an evaluation of the facility. Also, the findings suggest that an operator would be justified in requesting a second opinion on violations of individual standards found in her facility. A procedure for allowing such an "appeal" should be instituted.

Licensing Appraisal Forms

For each inspection of a day care facility for purposes of licensing, relicensing or monitoring of standards, the licenser uses some version of a "licensing appraisal form." These forms are used to record general descriptive information and the licenser's judgments on adherence to standards. They also serve to remind the licenser which items to check during an inspection. The appraisal forms should therefore contain items which adequately represent the full range of standards, or at least the most important standards. At least some of the lack of uniformity in applying standards may be attributable to the inadequacy of these forms. This section will discuss the appraisal forms and suggest some changes in them.

Need for single form. In keeping with the need to administer standards uniformly, there should be a single appraisal form for homes and another form for centers used by all licensers throughout the state. However, we found that only two offices out of 12 sampled used the same day care appraisal form. In other words, there were at least 11 different forms in current use for homes. Most offices did use the "official" version of the day care center appraisal form (CFS-516); however, licensers in

Table V-5. Licenser responses to questions about day care center standards.

Question	Yes	No
Is it a violation of the standards to serve Hawaiian Punch as a fruit drink for a mid-session snack?	45%	55%
If a center furnishes transportation for children, must the driver have a chauffeur's license and not just a regular driver's license?	53	47
Is bologna an acceptable meat to serve as a main meal?	55	45
If a first aid kit contains soap, cotton balls, a roll of two-inch bandage, bandaids of varied sizes, and a package of 4 x 4 dressings but no adhesive tape, would it be an "appropriately equipped" first aid kit?	55	45
Is it a violation for a center to have a group of 10 infants with two staff?	63	37
Can the space beneath a large table (4 feet high and 30 square feet on top) be counted as indoor activity space for children?	65	35
If children in a center were not taken outside at all during the months from December to March during a normal winter, would this be a violation of standards?	74	26
If trees and shrubs occupy space in the outdoor play area, would this space be counted as part of the outdoor activity space for children in a center?	74	26
If a bathroom in a center had hot and cold running water but not toilets with running water, would this be a violation of standards?	84	16
Is it a violation for a child's hands to be slapped lightly once as a part of disciplinary action in a center?	87	13

two offices said they had never seen this form. Thus, there is a definite need for statewide standardization of home and center appraisal forms.

Revision needed. There is also a need for revision of existing forms. The majority of day care home forms in use seem to cover home standards adequately. However, most of the forms evolved from foster home forms, and in some offices foster home forms are still used. Some of the forms now used contain items dealing with the family's religious preference, the mother's hobbies, and the father's physical build. Such items appear to go beyond what is necessary in evaluating a day care home, especially if they are examined at the expense of other items which relate directly to the standards. In any event, it would be extremely difficult to deny a license on the basis of such items since they are not listed in the day care home standards.

The day care center appraisal form in general use is complete with respect to standards dealing with administration, record keeping, and features of the physical setting. But coverage is very spotty for the program and care provided by the center. Also, some of the items are redundant ("center adheres to the provisions of license") and others refer to more than one feature of the standards ("keep premises in clean, safe and sanitary condition").

It is recommended, then, that appraisal forms be reformulated and standardized. The current effort to revise the standards themselves was discussed in Chapter IV. When this revision is complete, the appraisal forms will presumably have to be redesigned.

In this redesign, several suggestions might be considered. First, for standards which may have degrees of compliance (e.g., "good personal hygiene is practiced by all persons in the center"), the licenser should be able to indicate the level of compliance. An "A-to-F" grading system indicating degrees of compliance and noncompliance might be appropriate. Such a system would yield more information about each item being rated. This should:

help detect improvement or deterioration over time;

allow licensers to concentrate during future visits on items with lower "grades";

enable a new licenser taking over a case to become more readily familiar with it;

formalize the informal grading systems which are now used by some licensers; and

bring more uniformity into the interpretation and application of standards.

The IEFC staff asked licensing representatives for their suggestions for change in the appraisal forms. Table V-6 displays the major types of changes recommended.

Table V-6. Percentage of licensing staff favoring various recommendations for changes in the home and center licensing appraisal forms.

	Percent of Licensers Favoring Changes	
	Home Forms	Center Forms
Forms should concentrate more on checklist format.	64%	51%
Forms should concentrate more on a narrative, descriptive (as opposed to checklist) type of format.	37	46
Forms should include more items relating to the personal characteristics of the operators and child care staff.	91	87
Forms should include more items relating to the quality of the program.	81	90

New forms might also incorporate the recommendation in Chapter IV regarding a hierarchy of standards. If both these suggestions were implemented, an appraisal form such as Figure V-1 might be appropriate.

Standards considered to be of greatest importance would be grouped together at the beginning of the appraisal form, since these are the most crucial items which should be checked first. Thus, if a licenser were in a hurry during a visit, she could be sure to check the most important standards first and devote less time to checking the others.

For each standard, the degree to which the facility is in compliance would be indicated by the A to F scale. At the bottom of each group would be a row for the total number of checks in each column. Enforcement action could then be geared more closely to the actual severity of the problem as measured by these scores.

00056

Figure V-1. Possible format for appraisal forms.

	A	B	C	D	E	F	N/A	COMMENT
Group 1 Standards								
1.			✓					
2.				✓				
3.		✓						
Total		1	1	1				
Group 2 Standards								
1.	✓							
2.		✓						
3.				✓				
4.							✓	
Total	1	1		1			1	
Group 3 Standards								
1.			✓					
2.					✓			
3.			✓					
4.						✓		
Total			2		1	1		

Key to letter scores:

A: superior compliance; substantially above standard
B: good compliance; above standard
C: compliance; meets standards
D: marginal or doubtful compliance
E: substandard, but plans to comply immediately
F: substandard, and cannot or will not comply
N/A: not applicable, or not checked during this visit

Training for Licensers

Even with revised forms, the evidence in this chapter shows a clear need for DCFS to undertake a formal training program to insure uniform application of standards. The IEFC staff asked licensing representatives for their suggestions for training. Their suggestions included:

closer supervision of new licensers;

paired-observers visits, such as those described in this chapter;

videotape presentations, such as the one described in this chapter;

a required examination for new licensing representatives; and

annual statewide meetings for staff training and development.

It is further recommended that DCFS develop and publish a set of instructions and procedures on how to inspect a day care facility. These should be included in a comprehensive day care licensing manual and should include directions for filling out the appraisal forms as well as clear examples of compliant and noncompliant conditions for each of the standards. For some items, such as child/staff ratios, the compliance status is spelled out by a clear dividing line. But for many items, such as discipline or supervision of children, there is no clear-cut formula for determining compliance. For this type of item, examples of compliance and noncompliance might be useful.

VI. LICENSE ISSUANCE

This chapter deals with the licensing process through the point of initial license issuance. During the period between receipt of an inquiry and issuance of a license, the applicant learns the requirements for operating a day care facility, and DCFS assesses the ability of the applicant to provide quality day care. If the license issuance process is adequately performed, it serves to screen out applicants who do not meet the standards. Also, for marginal day care facilities, it may be simpler and less expensive in the long run to deny a license initially than to revoke it later.

This chapter reviews each step of the initial licensing process, pointing out specific problems encountered. The chapter's sections are:

Initial contact; this section discusses community awareness of the licensing system and delays encountered between the initial contact and the licensing visit;

licensing study; this section considers the time required for the visit by the DCFS representative;

other inspections; this section discusses other State and local agencies which must approve day care operations, delays caused by their inspections and problems of inter-agency coordination;

final license approval; this section looks at what the central DCFS office at Springfield does after the licensing representative and the other agencies have approved a facility, and includes consideration of the duration of licenses (now set by law at two years); and

the screening function; this section discusses those who drop out of the licensing process and those who are denied licenses.

Initial Contact

The license issuance process begins when DCFS receives an inquiry, usually by telephone, from someone interested in operating a day care facility. A licensing worker then mails out information about becoming licensed. The next step is a personal interview with the applicant. There are two major problems which may be encountered at this stage: (1) individuals interested may not know they need a license or may not know whom to contact; and (2) delays may occur between the applicant's request for a visit and the actual visit.

Delays in license issuance should be minimized for three reasons. First, because an applicant may have to incur some expense in order to meet the standards, he should be able to begin operation as soon as possible in order to recover such expenses. Second, delays create inconveniences for parents and children who need day care services. Third, delays may encourage an operator to begin accepting children without a license, thus violating the law. DCFS should therefore attempt to minimize delays in the license issuance procedure, although not at the expense of the screening function.

Awareness of need for license. We found from our surveys that fewer home operators than center operators were aware, when they first became interested in providing day care, that a State license was required. Among operators of facilities licensed in the past 18 months, about 37% of home operators and 5% of center operators reported that they had not known they needed a license.

In addition, 37% of the home operators and 7% of the center operators had not known whom to contact for a license. This suggests that DCFS should make its responsibilities for day care licensing more widely known. Chapter IX contains a discussion of some approaches which DCFS might use to achieve this.

Time period before licensing visit. Operators of recently licensed facilities were asked how much time elapsed between their request for an inspection visit and the DCFS licenser's initial visit. Licensers were asked a similar question about how long they thing this period is. Their responses are shown in Table VI-1. As might be expected, for both homes and centers, operators generally reported a somewhat longer lag between request and visit than did licensers. Also, the reported lag for homes was somewhat longer than for centers.

Table VI-1. Day care operator and licenser estimates of time between request for a licensing inspection and actual inspection.

	Respondent			
	Day Care Home		Day Care Center	
Length of Time	Operators	Licensers	Operators	Licensers
Less than 1 week	15%	0%	19%	13%
1-2 weeks	34	36	41	55
2-3 weeks	16	25	16	10
3-4 weeks	11	19	9	13
1-2 months	10	17	6	3
2-3 months	5	0	4	-
3-4 months	3	0	1	-
4-5 months	1	0	-	-
5-6 months	0	0	-	-
6 months-1 year	3	3	-	3
More than 1 year	2	0	4	3
Number of respondents	166	36	82	31

Note: Only those operators of recently licensed facilities were included in the analysis.

Fourteen percent of the home operators and 9% of the center operators reported that it took two months or longer, which seems unreasonably long, for a licenser to make an initial visit. The effect of such delays may well be to discourage potential operators from opening (or from applying for a license). It should be noted, however, that 76% of homes and 85% of centers were visited within four weeks of their request.

Licensers were asked what could be done to shorten this time period. About one-fourth responded that more licensing staff would be required, and one-tenth said that additional clerical help could free licensers from paperwork. Licensing staff members also reported delays in municipal inspections (see pp. 50-51) and in obtaining medical examination reports from applicants. It is recommended that DCFS set specific objectives for reducing time delays at this stage of the process. It would seem reasonable to require licensers to visit facilities within four weeks of the request date.

Licensing Study

The licensing study consists chiefly of one or more personal interviews between the applicant and a licensing worker. These interviews are usually held at the site of the facility to be used for the day care service. This enables the licenser to check, among other things, the physical characteristics of the proposed facility, the personal attributes of the applicant and, in day care homes, how the applicant cares for her own children.

Although the basic procedure followed in licensing a day care home is the same as that followed for a center, the time required to complete the licensing study for each differs. The IEFC staff's survey found that the average number of visits made to a day care home prior to license issuance was 1.6, and the average number of initial visits to a center was 3.2. In addition, day care home visits were shorter--on the average about two hours, compared to over five hours for each visit to a center.

Even though it takes less time to license a day care home, there are almost twice as many home applicants to be studied. Each day care home licensing worker has an average of 21 applications in process, while day care center workers averaged 12. In the same survey, licensing workers reported that they averaged 79 initial home licensing visits and 30 initial center licensing visits per worker last year.

Thus, each worker who licenses homes spends an average of about 158 hours or 20 man days per year (79 initial visits x 2 hours per visit) on initial studies. For center licensing workers, the average would be 150 hours per year or 19 man days (30 initial visits x 5 hours per visit). These estimates exclude the time spent traveling to and from facilities and completing related paperwork.

Certain DCFS offices throughout the state, notably Rockford and Aurora, have been experimenting with methods for decreasing the time required for an initial visit. These offices have developed forms which can be sent to applicants and filled out prior to the visit from the licensing worker. The pre-mailing of such forms can save time during initial visits, particularly with regard to questions operators might not be able to answer on a moment's notice. However, for most items the licenser would still have to verify the information given if she were to fully meet her responsibilities.

Other Inspections

Even after the initial DCFS licensing visits have been completed, other regulatory agencies--including the State Fire Marshal, the Department of Public Health, and local building, fire and health officials--must inspect a facility before a license is granted. Under "home rule," the State's authority to issue day care licenses can be superseded by municipal ordinances. That is, a facility must not only meet State standards, it must also conform to local codes--which may be more stringent than State requirements--before it can be fully licensed.

Municipal licenses and inspections. Certain municipalities, notably Chicago, East St. Louis, Rockford and Danville, issue a local day care license. In Chicago, inspections are required by the City Board of Health, the Building Department and the Fire Department prior to license issuance. Also, an annual license fee of $55 is charged. In East St. Louis, day care facilities are inspected before licensing and are charged a $50 annual fee. In Rockford, both homes and centers are inspected prior to license issuance and annually thereafter, but only day care homes must have a municipal license, called a Home Occupation Certificate. The fee for this license is $25 for the first license and $15 annually for subsequent licenses. Danville makes inspections of facilities caring for five or more children and charges $10 for a municipal license. Other municipalities, such as Bloomington, make initial inspections prior to the issuance of a State license but do not require a municipal license.

One effect of these municipal inspections is that the State license may be held up indefinitely until such inspections are made and the reports on them are received by DCFS. In Chicago, DCFS staff members told us that some license applications have been pending for periods ranging from three months to more than a year, due to delays in municipal inspections. In some instances, the inspections have apparently been made but the paperwork was delayed.

Speeding up municipal procedures is largely beyond the direct control of DCFS. However, it is recommended that DCFS licensers in each office become familiar with local building, zoning, fire and health ordinances that relate to day care facilities. Summaries of local requirements should be mailed to potential day care applicants along with copies of State standards. DCFS field workers should work closely with local officials in preparing these summaries and should meet regularly

with them in order to ensure that both groups at least keep up to date on changes in regulations and other mutual problems.

Homes licensed by child welfare agencies. DCFS personnel are not the only ones who conduct initial studies of child care facilities. The Child Care Act of 1969 enables licensed child welfare agencies to make initial studies of homes and to file applications for licenses with DCFS on behalf of these homes. A child welfare agency is defined in the Child Care Act of 1969 to be "a public or private child care facility, receiving . . . children for the purpose of . . . placement . . . in facilities for child care, apart from the custody of the child's or children's parents." DCFS does not conduct interim study or relicensing visits of homes supervised by such agencies.

There are approximately sixty such child welfare agencies licensed by DCFS. As of March, 1974, they had made initial studies and filed license applications for 42 day care homes and seven night-time homes. Only children under the child welfare agency's protection or custody are placed in these homes.

It was beyond the scope of this study to examine the quality of licensing and regulation achieved for these facilities. However, just as with facilities directly regulated by DCFS, it is an open question whether either initial or subsequent inspection visits are adequate to ensure that minimum standards are met.. At the very least the Department's own day care licensers should make inspection visits to a sample of these facilities to see if they meet standards. If they do not, then the Department should either take steps to strengthen the agencies' inspection and enforcement activities or take over these duties.

Final License Approval

After the licenser and other inspectors are satisfied that the applicant should be issued a license, the licenser's recommendation is sent to the central DCFS office in Springfield, which then sends out the actual license. This section briefly discusses some delays which occur at this point, and then considers the question for how long a period an initial license should be valid.

Springfield central office. Central office employees say that a license is usually mailed out 10-14 days after receipt of the approved application from the field. The main reason for this delay appears to be a requirement that each license be sent to the Director's office for his signature. This is purely a formality since the Director apparently does not review each case personally before signing the license--nor should he be expected to do so. It is therefore recommended that DCFS employ licenses with pre-printed facsimile signatures and that central office attempt to put new licenses in the mail within three working days after receipt of an approved application.

In the case of day care centers, the Department may issue either a license valid for two years or a temporary permit good for six months. The intended function of a permit is to give a center more time to achieve full compliance. There is no limit in the statute on the number of permits which may be issued to any one center, and this could provide a loophole for unqualified centers to continue operation. However, it is DCFS policy not to issue more than two permits to any center, and the Department appears to be enforcing this. Of the 100 centers operating under permits as of June 1974, 75 were on their first permit, 24 were on their second permit and only one had been issued a third permit. For day care homes, no permit option exists. Such an option should be considered for homes; this would require an amendment to the Child Care Act.

Another type of short-term permit should also be considered. Since the license issuance process at the Springfield office is essentially an automatic procedure, licensing representatives should be authorized to issue interim permits, valid for perhaps thirty days and nonrenewable, once a facility has met all requirements. This would enable the operator to begin taking in children immediately, without waiting for the paperwork to be sent to and processed at Springfield. This would also require a statutory amendment.

How long should a first license be valid? Currently, day care home and center licenses are valid for two years after the date of issuance. This statutory provision applies both to the first license and subsequent licenses. Day care home and center operators and licensers were asked to indicate their preferences for the duration of licenses. Their reponses are presented in Table VI-2.

Some support can be seen for the idea that the initial license should be valid for only one year. A two-year duration for subsequent licenses seems to be generally acceptable. A significant minority of home operators indicated they would like to have at least three-year licenses. However, it should be noted that a 1973 HEW study of state and local day care licensing found that 44 of 50 states require center licenses to be valid for only one year, with Illinois one of only 4 states granting a two-year license. Also, 36 of 39 states licensing day care homes had a policy of one-year licenses.

It is probably not necessary to have both a one-year initial license and a six-month permit option, but one kind of probationary or provisional license is desirable. Therefore, it is recommended that DCFS consider which approach is preferable and request appropriate amendments to the Child Care Act in the 1975 legislative session. Whichever option is selected, DCFS must bear in mind the additional workload generated by more frequent inspection visits.

The Screening Function

A good licensing system should either discourage substandard applicants from seeking a license, or deny them licenses after inspection.

TABLE VI-2. Day care operator and licenser responses for duration of a day care license for first year and subsequent years of operation.

Length of Time	Respondent						
	Center				Home		
	Operators		Licensers			Licensers	
	1st year	after 1st	1st year	after 1st	Operators	1st year	after 1st
6 months	22%	1%	46%	2%	2%	15%	2%
1 year	44	21	41	46	16	50	43
2 years	25	51	13	49	41	35	50
3 years	8	21	-	-	31	-	-
4 years	-	-	-	-	1	-	-
5 years	-	-	-	-	2	-	-
Indefinitely	-	-	-	-	7	-	5
Number of respondents	414	409	39	41	385	46	42

1. Day care home operators were not asked about "first year" and "subsequent years"

Source: IEFC staff surveys

A licensing system which does not discriminate among applicants, or which does not weed out unqualified applicants, is not worth having.

To evaluate the current day care licensing system's performance, we examined two issues: (1) whether potential applicants dropped out of the initial licensing process before a decision was made because they felt they could not meet the standards; and (2) how many licenses were actually denied to applicants who did not drop out.

Dropouts. Estimates derived from data provided by workers who deal with initial inquiries indicate that approximately 25% of the persons who contact DCFS about a day care home license follow through to the stage where a licensing decision is made. For centers, approximately 45% follow through to the same stage.

A sample of people not following through on an application after contacting DCFS during the last six months ("dropouts") was obtained from the Springfield, Champaign, East St. Louis, and Chicago area offices. Ninety-one home license dropouts (of an initial sample of 204) and 54 center license dropouts (of an initial sample of 150) were contacted by phone and asked why they did not complete the license application.[1] For homes, 32% of the people contacted indicated that they did not complete an application because of some aspect of the standards. For this group the standard which the greatest number reported as discouraging them from applying was the requirement of medical exams for members of the day care home family. Only a small percentage said they did not wish to have their homes inspected by a representative of the State.

For centers, 41% of the people contacted indicated that they did not complete an application because of something in the standards which discouraged them. The most frequently mentioned problem in this regard was the sheer number of details and scope of the standards. Fire and building codes were also frequently mentioned. For both homes and centers, of those who mentioned some reason other than the standards, the most frequently mentioned reason was that the person had taken a job instead. It is interesting to note that of the people contacted, 83% of the potential home applicants and 91% of the potential center applicants felt that the State should license day care homes and centers, respectively. Thus, it appears that even people who did not complete licensing applications still felt that the licensing system was worthwhile.

Licenses denied. There were 1695 new home licenses and 238 new center licenses issued during 1973. According to estimates derived from licensers' survey responses, in that year 89 home and 15 center licenses

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[1]The low response rates for both samples are due in part to the fact that many people had moved, and because only 2 phone calls at most were made (in the late afternoon and early evening) to people. Time constraints did not permit a more intensive follow-up procedure.

were denied. Thus, about 5% of home applicants and 6% of center applicants were denied a license after the initial study had been completed. In this context, license denial refers both to those cases where the licenser informed the applicant of the decision not to license and to those cases where the licenser advised the applicant to withdraw the application (in effect, counseled the applicant out of the system).

Combining these figures with the "dropout" estimates, it can be said that--of all the people who contact DCFS about becoming licensed as a day care home or center operator--approximately 24% of those interested in home licenses, and 42% of those interested in center licenses, are ultimately successful in obtaining a license. Most of those who do not obtain licenses are screened out before the study is completed--formal negative decisions are rare.

Available evidence suggests that the initial licensing process does in fact "weed out" some clearly substandard applicants and that it may also deter a number of potential operators who believe their facilities will be marginal. However, because of delays either in the initial visit or in paperwork, some high quality applicants may also "drop out." Some of the recommendations made in the chapter address these delays.

No initial licensing process can guarantee that all licensed facilities will always adhere to standards, if only because conditions in any facility can change in the months and years following initial licensure. An initial licensing process is only a starting point for the regulatory process. The next two chapters consider subsequent phases of the process.

VII. MONITORING

After a facility has been licensed, DCFS licensing staff continue to visit it in order to monitor the quality of care provided. There are two kinds of formal DCFS inspection visits: "interim" visits, required by DCFS regulations, which can occur at any time; and "relicensing" visits, required by the Child Care Act, made when a license comes up for renewal. Day-to-day monitoring of a sort also takes place--facility staff members and most parents have an opportunity to observe the facility daily. But this process is informal and largely unrelated to the DCFS monitoring system.

If a licensing and regulation system is to work effectively, licensed facilities must be inspected frequently enough to detect violations of standards. This also implies that there must be manpower sufficient to make inspection visits. This chapter discusses inspection visits made by licensing personnel. It then examines the role of parents and staff in monitoring. Some conflicts in the licenser's role are discussed, and other State agencies which participate in day care monitoring are briefly considered.

Interim Visits

After a license has been issued, a DCFS staff member makes interim visits to the facility to ensure that standards are being met. When violations are found, the licenser recommends changes which will bring the facility into compliance. These are usually checked in subsequent visits. In fact, the primary purpose of many interim visits is to check on previous recommendations or potential trouble spots. In the case of severe violations or repeated violations, license revocation procedures may be initiated--but as shown in Chapter VIII, revocation is rare.

Number of visits. Our survey of the licensing agencies of other states revealed considerable variation in the number of required visits each year to licensed facilities. On one hand, Wyoming and Vermont reported that they require no visits to homes or centers; on the other, Utah reported requiring four visits to homes and twelve visits to centers each year. Typically, at least one visit for homes and two for licensed centers were required.

DCFS policy regarding the number of interim visits to be made to day care facilities is unclear. DCFS licensing regulations state in one section, "There shall be at least one annual on-site visit to each facility by staff assigned" while another section says, "Each facility assigned shall be visited, as often as necessary, in order to review its on-going program and continuing compliance with standards."

Another reference applies specifically to day care homes. This section states that, if children have been placed in the home by a child welfare agency (see Chapter VI), quarterly visits must be made to that home by an agency representative. Otherwise, the Department will make "periodic visits" to the home "as deemed necessary."

Thus, Department policy appears to require at least one visit per year to each licensed day care facility. Presumably, on alternate years, this requirement would be fulfilled by the relicensing visit. If conditions which demand closer supervision are identified in a facility, DCFS licensers may make more frequent visits "as deemed necessary."

Some confusion among licensers was noted regarding the policy on interim visits. Licensers generally agree that at least an annual visit to day care centers is required. Regarding homes, however, some licensers told us that quarterly visits were required, while others said that interim visits are made only in response to complaints received and not on a periodic basis. Uniform policy regarding interim visits to day care homes in particular does not seem to have been clearly communicated to licensers in the field.

Day care home and center operators were asked how many visits they received from a DCFS representative during 1973. Home operators reported receiving an average of 1.7 visits, while center operators reported an average of 2.4 visits.[1] It appears therefore, that on the average DCFS is meeting the objective of at least one visit per year to day care facilities.

On the other hand, not <u>every</u> day care facility is being visited at least once a year. In an IEFC survey, 11% of the home operators and 8% of the center operators reported they had received no visits from a DCFS licensing representative during 1973. In other words, nearly one-tenth of a sample of about 800 day care facilities had not been visited at all last year. If the same percentage holds for day care facilities across the state, then as many as 680 facilities may not have been visited last year by a DCFS representative.

These data from home and center operators are consistent with the claims of licensing staff that, due to heavy workloads, they often cannot make the required interim visits to each facility assigned to them. They reported that first priority is given to initial licensing visits to new facilities, then relicensing visits to facilities whose licenses are near expiration. Finally, interim visits are made if time permits.

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[1]These figures include an undetermined number of relicensing visits. For purposes of comparing the number of actual visits with required or desired visits, the categories of interim and relicensing visits will not be distinguished.

Operators, staff, parents, and licensers were asked to indicate the minimum number of visits which should be required for day care homes and centers. Their recommendations are presented below in Table VII-1.

Table VII-1. Average minimum number of recommended visits per year.

Type of Respondent	Average Number of Recommended Visits	Number of Respondents
Day Care Home		
Operator	2.66	378
Parent	2.53	259
Licenser	2.75*	47
Day Care Center		
Operator	2.22*	426
Staff	2.26	158
Parent	3.00	301
Licenser	3.61*	41

*After first year of operations.

The recommendations made by most operators, parents, and licensers far exceed the current minimum requirement of at least one annual visit. There was overall agreement that at least two visits annually are needed for day care homes. For day care centers, operators and staff recommended at least two visits, while parents and licensers thought at least three visits were needed.

Clearly, most respondents--even operators--felt that only one annual inspection visit is insufficient for monitoring day care facilities. Thus, there appears to be sufficient opinion in favor of more frequent visits to warrant reexamination of the policy of one visit per year.

This policy might be evaluated through the following experiment: For a one-year period some home licensers in various areas of the state could separate their workload into three roughly equal parts, preferably on a random basis. For one-third of the facilities, one return visit could be made; for another third, two interim visits; and for the remaining third, three visits. (During the year, some facilities might, of course, need to be visited more than the one, two, or three times called for by the experiment. This would not be discouraged because it might be necessary to correct an unacceptable situation, and it is consistent with normal practice.)

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At the end of the year, all facilities would be given a relicensing inspection and the three groups would be compared on the number of individual noncompliances as well as the number of licenses discontinued. A different licenser, who did not know in advance which facilities were in each group, should do the relicensing visits. This experiment would give evidence as to the relative effectiveness of one, two, and three interim visits per year.

DCFS should give serious consideration to increasing the number of required visits. When a new policy is determined, it should be clearly written into Department regulations and explicitly communicated to licensers in the field.

Manpower needed for interim visits. From the preceding section, it is clear that some required interim visits are not being made at present. In addition, if DCFS decides to increase the number of required visits, more staff would be needed. The IEFC staff calculated how many licensing staff would be needed to make these visits and also to process anticipated new applicants.

In a June 1974 telephone survey of full-time licensing representatives, we found that licensers actually spend about two and one-half days per week in field work. This estimate was used as the basis for the calculations which follow. The rest of the time they are in the office performing related tasks (reading case records, filing reports, and so on), and some of that office time could be saved by hiring clerical help.

Table VII-2 shows the number of full-time equivalent (FTE) licensing staff currently available and the total number required for homes and centers, depending on how many interim visits are made each year. As Chapter III showed, there were 49.4 FTE day care licensing workers as of June 1974. Thus, from Table VII-2, it can be seen that there are sufficient personnel to make one visit per year to every facility and additional visits to some. However, even if the number of required visits were increased only to two, DCFS would need an additional 10.4 FTE licensing representatives. Appendix VII-1 contains a full explanation of the methods used in these calculations.

Table VII-2. FTE manpower needed for interim visits.

	Current Number of Licensers	Interim Visits Per Year 1	2	3	4
Homes	26.7	18.5	34.3	50.1	65.9
Centers	22.7	16.8	25.5	34.3	43.0
Total	49.4	35.3	59.8	84.4	108.9

Announced versus unannounced visits. There is no clear departmental policy about unannounced visits. Interim visits and sometimes relicensing visits are made either announced or unannounced at the licenser's discretion.[1] Most licensers indicated that they make unannounced visits after a complaint is received about a home or center, and many licensers feel that at least one unannounced visit per year is appropriate. Some licensers believe that all visits should be unannounced, while others feel that all visits should be scheduled.

Unannounced visits are more likely to reveal an accurate picture of the facility's operations. Licensers have told us noncompliances are more apt to be found on unannounced than announced visits. Licensed day care home and center operators told us that even when their facilities were vastly substandard (especially with regard to overenrollment and child/staff ratio violations), they could make their operations temporarily look good for an announced visit. For example, extra staff could appear on the day of the visit, and extra children could be taken away from the facility for the duration of the visit. For this reason and because they feel that a significant number of facilities are substandard, some operators urge more unannounced visits. Others, especially home operators, resent such visits as an intrusion on privacy or as disruptive to programs.

At present there is no clear legal basis for the licenser's access to a facility on an unannounced visit (or even an announced visit). Some licensers are able to recount cases where an operator suspected of running a substandard facility refused to let the licenser in the door. Accepting unannounced visits as a conditon of being licensed is not mandatory.

It is recommended that acceptance of unannounced visits be made a condition of the license. There is precedent for such a provision. For example, unannounced visits are among the conditions of nursing home licensure by the Illinois Department of Public Health. While annual relicensing visits are scheduled in advance, the Department of Public Health tries to make three unannounced interim visits per year.

One problem with unannounced visits is that the licenser may find no one at the facility. A home operator may have taken the children shopping, or a center's children and staff may have gone on a picnic. Thus, a trip for an unannounced visit may be in vain. Several licensers complained that, when this happens, their local office does not reimburse their travel. One licenser pointed out to us that she may have to drive 50 miles to a facility without reimbursement and is, therefore, reluctant to make unannounced visits. Because of the potential value of unannounced visits in monitoring, it is strongly recommended that DCFS provide the necessary support for such visits.

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[1]This issue is more germane for interim than relicensing visits because the relicensing visits usually require more time and advance preparation of records and reports by the operator to facilitate the inspection.

Relicensing

By the time a license for a day care facility expires, a relicensing study should have been completed and a decision already made as to whether a license will be renewed. Thus, for a licensed facility, a relicensing study will occur about once every two years. However, DCFS policy on renewal studies for six-month permits (see Chapter VI) is not clear. If a six-month permit is to be renewed, a full relicensing study should be required.

In theory, a relicensing study is a more formal procedure than an interim visit. Also, a relicensing study should involve a complete examination of the facility, much the same as an initial inspection study. However, home licensers reported that on the average they spent only about 1.2 hours on relicensing studies for licensed day care homes compared to 1.8 hours for interim visits. The average time for interim visits is longer partly because many interim visits are made in response to complaints and therefore call for a more intensive inspection. On the average, center licensers reported that they spent 4.7 hours on center relicensing studies.

Some licensers use relicensing as an opportunity to weed out substandard facilities, since it is easier to discourage an operator from renewing than to revoke a license or not renew one. When an official decision is made not to renew a license and there is a presumption that the operator wishes to continue the license, DCFS, according to the Child Care Act (Section 9), must notify the licensee. Within ten days of notification, the licensee may request a public hearing and a list of violations. The hearing procedures are fairly detailed; see Appendix VIII-1.

Licensers reported that, during 1973, they persuaded 59 home and 27 center operators not to renew their licenses. This is a liberal estimate of nonrenewals and represents 3.5% of the total number of homes and 3.3% of the centers which faced a license renewal decision. Clearly, some screening out is occurring for licensed day care facilities.

Whether such attrition is detrimental to the supply of licensed facilities is an open question, but most licensers we talked to feel that such figures are low compared to the number of facilities which they felt should not be licensed. They felt that most substandard facilities remained licensed because revocation procedures are difficult.

The Role of Parents and Staff

As noted in Chapter II, day care parents and--in the case of centers--the child care workers (staff) can play a part in monitoring the quality of care given in a day care facility. To provide some perspective, we asked each of the operators, parents, and staff in our surveys to rank the relative importance of day care participants in monitoring a day care facility. Thus, for day care centers respondents were

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asked who was the most important (indicated by a 1), second most important (indicated by a 2), and so on to the least important. The results for homes are presented in Table VII-3. Appendix VII-2 is a more detailed version of this table. The rankings for centers were the same for all types of respondents--operators were first, followed by staff, parents, licensers, and children. The operator is generally regarded as the most important and the licenser the second least important in monitoring the quality of care in both homes and centers. Such results suggest the need to keep in mind that the licenser's monitoring role though formal is limited in the eyes of other participants in the day care system.

The roles of parents and staff in monitoring are, however, also limited. For example, day care center staff are perhaps in the best position to observe the quality of care in a center, but in cases where they personally are the cause of substandard care, they are likely to be reluctant to own up to their shortcomings. Also, they may not wish to jeopardize their job by complaining to the operator or the licensing representative about instances of standards violation.

Table VII-3. Overall rankings of importance in monitoring the quality of care in a day care home.

Importance of:	Type of Respondent		
	Operator	Parent	Licenser
Operators	1	2	1(tie)
Parents	2	1	1(tie)
Children	3	4	4
Licensers	4	3	3
Number of respondents	307	273	38

Note: 1 = most important; 4 = least important. Ranks were derived from mean ranks for each category of respondents.

Parents. Parents of day care children would presumably be far more willing to take action on inadequate care, but they usually lack sufficient opportunity to observe what goes on in day care facilities. Typically, a parent brings a child to the home or center, stays a few minutes, then leaves. Picking up the child also only takes a matter of minutes on a normal day. To illustrate, 69% of the parents of children in day care centers whom we surveyed indicated that they spent less than 30 minutes per week in the center (including dropping off and picking up the child). A reasonable estimate would be that a typical parent spends three minutes in the center on each trip. Although day care home parents were not surveyed on this item, it seems unlikely that they spend much time in the home, but they may sometimes stop to chat with the day care mother. Parents of day care home children have

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a slight advantage over center parents, since the home operation is smaller and the parent may be more readily able to discuss what went on during the day.

In some center situations, it may not be easy for parents to talk with the person who supervised their children during the day. There may be a crowd of parents on hand, or the part-time staff worker or volunteer who supervised the child may have gone home before the parent arrived. When centers furnish transportation (25% indicated that they did), parents may go weeks without setting foot in the center.

At least partially for this reason, it is not uncommon for day care centers to have special parent/staff meetings where a child's progress and the activities of the center are reviewed. When operators, staff, and the parents were asked about these meetings,[1] it was found that 58% of the operators and 57% of the staff, but only 36% of the parents, indicated that special staff/parent meetings were held. This discrepancy may have arisen for several reasons,[2] including different interpretations by parents of what constituted a meeting, problems in communicating so that some parents did not know of the meetings, or response bias. Typically, parent/staff meetings were held every few months and lasted from 15 to 30 minutes each. Such meetings may enhance parents' ability to check on the quality of care given in a center, but in general they are probably not extensive enough to permit effective parental involvement in monitoring and enforcing standards.

In addition, when parents find something wrong with a facility, they are usually not in a good position to help rectify conditions, even when the level of care is such that the child's welfare is endangered. Parents were asked what steps they would take if conditions in a day care facility were not adequate to guarantee the welfare of the child. The most frequent response for both home parents (53%) and center parents (34%) was that they would simply remove the child.

In summary, parents and staff are potentially important in the overall monitoring process, but their effectiveness is limited. For parents, the limiting factors are insufficient opportunity to observe a facility and inability to directly determine the quality of care. For staff, the constraint is more in terms of their relationship with their employer. This means that, despite limited monitoring capabilities, licensing representatives must play a key role in ensuring compliance with standards.

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[1]These data are based only on these centers for which we obtained parent and staff responses to allow for meaningful comparison with operators' responses.

[2]In fact, there was disagreement among parents from the same center as to whether meetings were held. For 22% of the centers, there was at least an 80-20% split on the reporting of meetings.

There are, however, several steps which could be taken by DCFS to help parents become more informed about facilities and to put them in a better position to influence licensing policies and the quality of care in homes and centers. First, as noted in Chapter IV, parents can be furnished summaries of the standards. Such "consumers' guides" would let them know what minimum conditions they should expect of a facility.

Second, parents and operators should be allowed access to the appraisal forms for facilities. Thus, a parent who is considering enrolling her child in a particular home or center could look at the record of that facility. This could enhance the role of parents in monitoring facilities. In addition, it would probably make operators more concerned about meeting violations of individual standards which might not lead to license removal but which would be placed on the appraisal form record for parents to see. If this were done, it might be desirable to allow a space on the appraisal form for the operator to reply to negative findings. Some DCFS foster home evaluation forms now contain this feature.

Finally, DCFS should periodically survey parents of children in licensed day care facilities in order to obtain feedback for evaluation purposes. This would also heighten parents' awareness of DCFS as the State agency responsible for regulating day care services.

Conflicts in the Licenser's Role

Conflicts in the licensing representative's role may impair her ability to monitor facilities properly or to take necessary enforcement actions. There are two major areas of potential conflict for the licenser in her role as an enforcer of standards. The first is the conflict between friendship and supervision. Licensers and operators not only interact during interim and relicensing visits, but they may also meet at local and state child care association and child welfare organization meetings. In addition, they may serve together on task forces, standards committees, and other groups of mutual professional concern. Then, too, in smaller communities they may know each other as neighbors or as members of the same church or civic group. It is therefore hardly surprising that some licensers have developed personal relationships with operators. The friendship developing from this relationship may weaken the licenser's ability to monitor or make her more lenient in enforcement. For example, if a licenser knows that an operator resents unannounced visits, the licenser may be inhibited from making such visits.

Findings from our surveys of and interviews with licensing workers revealed that the extent to which a licenser perceives herself as having a friendly relationship with the operators of facilities she licenses was inversely related to: the extent to which she perceives herself to be a strict enforcer of standards; and the number of homes

in her workload which she thought were substandard, but upon which she did not take formal enforcement action.

The second potential conflict arises because some licensers have developed what can be termed a "resource development" orientation toward licensing. That is, they are interested in working with substandard facilities to help them meet standards; for facilities that marginally meet standards, these licensers want to help them develop their programs to higher levels of quality. Such an orientation may diminish the licenser's ability to be a strict enforcer of standards. As a result, licensed facilities may continue to operate at a substandard level while an attempt is made to develop them, when what is really called for is revocation or nonrenewal of the license. Or, marginal or substandard facilities may go along for months without getting a license when they should have been denied a license outright.

IEFC survey data showed that the extent to which licensers agreed with the statement "one should work with a facility that is just getting started if it doesn't quite meet standards, rather than refusing to license it altogether" was inversely related to:

> the licenser's perception of herself as a strict enforcer of standards;
>
> the number of homes and centers for which she denied a license in 1973 after an initial study was completed; and
>
> the number of new homes and centers whose licenses she refused to renew in 1973.

Further details are given in Appendix VII-3.

It should be noted that analysis of our survey data showed friendly relationships with operators and resource development orientations to be related characteristics. While both of these characteristics may inhibit the licenser's tendency to be a tough enforcer of standards, they may also yield some advantages. For example, facilities which otherwise might be unlicensable may improve their condition to an acceptable level with the assistance of a friendly, development-oriented licenser. Such efforts may expand the available supply of acceptable day care facilities.

As noted in Chapter III, the fact that licensers will still be providing both consultation and supervision of standards means that the potential conflict between the two functions remains. Since this conflict is especially relevant for marginal facilities, it is recommended that coordinators be aware of the problem and make occasional spot-checks on facilities which remain "under study" for an initial license or license renewal for a long period of time. Also, coordinators should review

problem facilities with licensers and see if a disproportionate amount of time is being spent by the licenser in trying to bring them up to standards. In some of these situations, a decision should probably be made to either refer the facility to the resource development unit or to revoke or deny the license.

The Role of Other State Agencies

Besides DCFS, there are four State agencies which participate in monitoring the quality of care and facilities of some licensed day care centers--the Office of the Superintendent of Public Instruction (OSPI), the Department of Mental Health (DMH), the Division of Vocational Rehabilitation (DVR), and the State Fire Marshal.

OSPI. Local school districts purchase educational services in over 200 Illinois private day care facilities for children ages 3-21 who are so severely handicapped that public schools cannot meet their needs within existing special education programs. OSPI in turn reimburses the school districts up to $1400 per child. OSPI has a set of rules and regulations for such facilities and plans to make an evaluation visit to each at least every four years.

OSPI may not close down a facility. Instead, it may not approve the local school district placement of children in particular centers or it may not reimburse such placements.

DMH. The Department of Mental Health makes program grants on behalf of developmentally disabled children to 72 licensed centers. Visits by DMH staff representatives are primarily to evaluate program services being funded by that Department as well as to provide consultation to center staff. DMH may withdraw financial support from a facility but may not revoke its license.

DVR. Eighty-three sheltered workshops funded by DVR are given DCFS day care center licenses, but DVR conducts all inspection and monitoring of the facilities. The clients of these workshops are usually over 16 years old, and DVR standards are generally more stringent than DCFS standards, so this situation probably does not present a real problem.

Fire Marshal. The State Fire Marshall is not involved in funding day care centers but is concerned with supervising fire standards and does have formal enforcement powers. DCFS will not issue or renew a center's license until the State Fire Marshal certifies that it meets his requirements. While the Fire Marshal may make inspections at other times, this is not required by DCFS standards unless hazardous conditions are reported.

There is a set of State fire standards for day care centers but none for homes. The Fire Marshal told us that drawing up standards for homes would be an expensive and difficult undertaking and would probably result in even stricter standards than are currently being administered. The State Fire Marshal's office offered to put on an annual information and training workshop for day care licensing representatives. This workshop would cover the detection of potential fire hazards, the determination of potential violations, and corrective measures which can be taken. It is recommended that DCFS further explore this possibility with the State Fire Marshal.

Nearly one-fifth of the day care center operators responding to our survey said they had experienced some difficulty in meeting fire standards. Nearly a third of these claimed inconsistent recommendations were made by a single inspector or by different inspectors.

Problems were especially frequent in Chicago, where the local fire code is more stringent than State requirements. It is recommended that DCFS central and area administrators meet regularly with the State Fire Marshal and with local fire officials to ensure that DCFS licensers understand fire regulations and that fire officials are made aware of such problems as inconsistent recommendations by their inspectors.

Joint visits. About 10% of center operators reported that they felt there were too many different State inspectors visiting their facilities for various reasons. Over three-fourths of centers which receive funding from more than one State agency reported that it would be helpful to them if joint visits were made--that is, if all of the inspectors came at the same time. For some centers, however, joint visits were not wanted because their schedules and programs would be disrupted by too many people visiting their center at the same time.

It is recommended that an interagency committee be formed to explore the possibility of joint visits and of reducing the overlap between agencies. Such a committee might include local and federal administrators as well as representatives of the State agencies involved.

VIII. ENFORCEMENT PROCEDURES

A regulatory system cannot be effective if adequate and timely enforcement action is not taken against substandard facilities. Not only are children in such facilities endangered, but the absence of meaningful enforcement makes it more difficult to persuade marginal facilities to come into full compliance with standards. This chapter discusses the enforcement procedures of DCFS, including license revocation and actions taken against unlicensed facilities. The chapter concludes with a discussion of the support provided by DCFS to day care enforcement efforts.

There are three situations under which legal action becomes necessary: (1) license revocation, (2) DCFS refusal to renew a license or permit, or (3) prosecution of an unlicensed child care facility. Based upon the Child Care Act, DCFS developed its departmental regulations on legal enforcement procedures. The Department regulations are currently being revised, since they were previously written in a form which was very difficult to understand. However, no substantive changes are being made.

Legal enforcement procedures have, for the most part, remained paper regulations until recently. Licensing workers say that under previous DCFS directors they were told not even to bother with initiating action to revoke a license. They report that the Department was not interested in enforcing standards with legal action but preferred that licensers rely on persuasion, no matter how serious were the violations in some licensed day care facilities.

Recently, legal action has become a more feasible enforcement tool, due in part to the hiring of additional DCFS legal staff. Also, the creation of the OCD brought added administrative support for legal action against day care facilities. Former district administrators reportedly had not been willing to devote the necessary time or energy to prosecute day care facilities, since protective custody and juvenile court cases seemed to have more immediate importance for child welfare.

Possible State liability. If day care services cannot be rendered without a State license, the State is in effect taking responsibility for the maintenance of its standards in the day care "market." This means that the possibility of liability exists if the State, through negligence, fails to enforce its standards.

In Arizona, the State was held liable for a $1 million judgment when a child in a foster home died.[1] In a similar case, the State of

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[1] Hansen and Byos vs. State of Arizona, unreported.

Louisiana was held jointly liable with the foster mother for the death of a child.[1] The Illinois legislation establishing the Court of Claims (Chapter 37, § 439.1) seems to provide a vehicle for such suits in this state.

The trend of public opinion as well as the recent court decisions appear to indicate that the liability of the State is being increasingly broadened rather than restricted, and DCFS officials should be aware of this situation. Day care licensing standards must be carefully designed to protect children and must be uniformly applied and enforced.

If a child is abused, injured, or killed in a licensed facility, the parents will surely try to hold someone responsible. It is reasonable for the operator, rather than the State, to accept primary responsibility. It is therefore recommended that DCFS explore the feasibility of requiring day care facilities to carry complete liability insurance and perhaps require them to be bonded.

License Revocation and Nonrenewal

The precise number of cases in which legal action has been taken against a day care facility is unknown. Precise statistics are unavailable since such actions are reported in records which are kept only in area offices. However, DCFS administrators told us they did not know whether any actual revocations have occurred within the past year.

Statewide, DCFS licensing representatives reported only one day care revocation hearing last year. In this case the license was not revoked, and the licenser was reprimanded for "harassing" the operator. Further, no statistics were available from DCFS on numbers of licenses refused for renewal.

Licensers were surveyed as to whether they had initiated any action during the past year toward license revocation. Their responses indicated that action had been initiated against 37 day care homes and 22 centers. DCFS told us they were unable to ascertain whether these facilities were brought into compliance or whether the cases were simply dropped, only that no licenses were actually revoked.

It is recommended that DCFS pursue revocation more actively where needed, although not, of course, to the exclusion of other enforcement measures. There are two basic reasons for this recommendation. First, licensers have told us that there are some operators who cannot be brought into compliance by any other means and whose licenses should be revoked for the protection of the children involved. Second, there

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[1]Vonner vs. State of Louisiana through the Department of Public Welfare, 273 Southern Rep. 2nd 252.

are other operators from whom compliance could be gained by the threat of revocation action, but who presently have no reason to take such threats seriously. License revocation is a very weak sanction if it is never used.

The IEFC survey of licensing practices in other states show that day care licenses had been revoked during 1973 in 23 states of the 43 which responded. Fifteen states reported revoking some day care center licenses (averaging about two per state) and eight states had reported revoking some home licenses (averaging about three per state).

License revocation process. Theoretically, when other efforts by the licensing representative are unsuccessful in bringing a substandard facility into compliance, formal revocation procedures are initiated. The Child Care Act of 1969 authorized DCFS to revoke the licenses of facilities which fail to maintain standards. Sections 8, 9, and 10 of the Act briefly outline the procedure to be followed in the event that a license may be revoked.

The revocation procedure is designed to ensure that the licensee receives "due process of law." DCFS may not revoke a license without substantial evidence that such action is justified, since the Department would then be denying the individual his privilege to operate a business. The revocation procedure, which follows a conventional pattern, allows for a public hearing and for judicial review. A flow chart and description of the procedure may be found in Appendix VIII-1. Refusal to renew a license involves essentially the same procedure as revocation. Therefore, the procedure described would also apply to the situation in which an operator's license is not renewed.

Suspension. At present, if an operator is not in compliance with standards, there are only two choices under the Child Care Act- the substandard facility can be allowed to continue in operation, or action can be taken to revoke the license. There is no intermediate step, such as the suspension of the license until compliance can be achieved.

While allowing for administrative suspension would require amending the Child Care Act, it would seem to be advisable. Licensing representatives need an enforcement tool which is less drastic than terminating an operator's career through revocation, but more drastic than a verbal reprimand. In addition, because it is less serious, suspension could be a less time-consuming procedure than revocation. Of course, proper safeguards would have to be introduced to protect the rights of licensees.

Unlicensed Facilities

According to the Child Care Act, operating an unlicensed child care facility is a misdemeanor. Under the Unified Corrections Code, this could result in a sentence of a year in jail or a $1000 fine. Enforcement regulations therefore specify that unlicensed facilities be referred to the appropriate State's Attorney. However, the State's Attorney need not prosecute unless DCFS can show that the children in the home are endangered and that the operator has been given an opportunity to apply for a license but refused to do so. Only very few cases have been referred, and even fewer have been prosecuted, in spite of the estimated number of unlicensed day care facilities operating in Illinois (see Chapter IX). In discussions with IEFC staff, DCFS licensing workers mentioned difficulty in getting cooperation from the State's Attorneys to perform even an investigation.

Licensing workers had previously attempted to make some referrals when DCFS legal staff were primarily involved in juvenile court cases. Since the Fall of 1973, however, additional DCFS legal staff have been available to make contact with the State's Attorney, especially in Chicago. Repeated contacts were required at first to convince assistant State's Attorneys of the seriousness of such cases. However, since communication channels were established, several referrals of unlicensed facilities have been made to the Cook County State's Attorney and are currently in process.

In Cook County, there were eight complaints against unlicensed operators filed with the State's Attorney. In five cases, the operators agreed to apply for a license or closed down, so that full prosecution was not necessary. The three cases filed most recently (June) have been continued to August.

In other areas of the state, very little activity has occurred with respect to the prosecution of unlicensed facilities. A sample of 20 State's Attorneys were contacted and asked (1) whether any unlicensed day care facilities had ever been referred to them; (2) if so, whether prosecution had been undertaken; and (3) if so, whether convictions had been obtained. Twelve of the fifteen who responded said they had never received any such referrals and consequently had never prosecuted such cases.

Outside of Cook County, three referrals were reported. In two of them (in Champaign and Bloomington) the State's Attorney initiated prosecution, and the violators were brought into compliance.

In the third case, in Kane County, DCFS licensing workers became concerned about an unlicensed program operated by a church group. The State's Attorney's judgment was that the program was similar to a

church Sunday school program and so did not need a license. Therefore, he decided not to prosecute.

In such cases, if DCFS wished to pursue the issue further, the case can be referred directly to the Attorney General. In July 1974, the Attorney General's office reported receiving only four referrals on unlicensed homes, all since May 1974.

Injunctions. Due to delays in the prosecution of an unlicensed facility, DCFS legal staff in Cook County have begun relying more heavily on the use of injunctive powers. In Cook County, injunctions seem to be effective in persuading reluctant day care operators to apply for a license or to close, and injunctions are usually more easily obtained than prosecution. The use of injunctions, for licensed facilities with serious violations as well as unlicensed facilities, should be extended to other parts of the state.

Organizational Support for Enforcement

Recently, the departmental policy toward enforcement of day care standards has apparently changed. Current day care licensing workers report that during prior administrations they were told not to be overly strict with day care operators and not to attempt to close a facility.

The current central DCFS administration says that it is committed to a strict enforcement policy. Legal staff have been assigned specifically to strengthen DCFS enforcement efforts, to revise enforcement procedures and to undertake legal action against substandard day care facilities. Day care standards are being revised to make them more specific and enforceable.

However, the Department does not keep records in the central office concerning numbers of licenses denied, refused reissuance, or revoked. It has no central records of the disposition of cases in which office conferences or public hearings were held, or of the number and disposition of unlicensed facilities cases referred to State's Attorneys. It is recommended that DCFS keep records of enforcement action being initiated so that effectiveness can be assessed.

Part of the difficulty originates within local area (district) offices. Licensing policies set forth by the central administration are rarely communicated directly to the workers but rather come to them via their individual area administrators and immediate supervisors. Therefore, licensing practices usually reflect the attitude of the area administrator or supervisor. The variations which result raise some question as to whether children, parents, and operators in all parts of the state receive equal protection under the day care licensing system.

Enforcement efforts require additional time, effort, and departmental expense. Some area administrators who have talked with IEFC staff have generally agreed in principle that enforcement of day care standards is important. Yet they have generally not wanted to encourage workers to be strict enforcers since additional visits, office conferences and hearings would be required.

Some licensing workers reported to IEFC staff that at times they encountered serious violations of standards in licensed facilities, considered possible enforcement techniques, and were then told "forget about it," "don't rock the boat," or "stop harassing the operator" by supervisors or local administrators.

In the IEFC licensing staff survey, workers were asked about whether support for enforcement efforts was received from the central office, from administrators and from supervisors. (See Appendix VIII-2.) Perceptions of support from central DCFS were clustered around the neutral/undecided response category, indicating that many workers did not really know whether or not their efforts would be supported. About one-third actually thought their efforts would not be supported.

Workers tended to believe their area administrators were more likely to stand behind enforcement efforts than the central office but would be only slightly more likely to support license revocation efforts. Local supervisors were most often perceived to provide support for enforcement efforts, more so than either central DCFS or area administrators.

The actual enforcement behavior reported by licensing representatives was closely linked to the licensers' perceptions of organizational support. Licensers who felt that their superiors would support their efforts were more likely to report having initiated revocation action and refused to renew licenses. Similarly, licensers who felt that their superiors had a resource development orientation were less likely to initiate enforcement action (see Appendix VII-4). These findings suggest that the more organizational support is received, the more likely it becomes that workers will actively enforce standards.

DCFS legal staff. Legal staff is another form of organizational support for enforcement. DCFS employes six lawyers, two in Springfield and four in Chicago. The legal staff director explained that most of their work focuses on juvenile court cases. However, during the past year, two of the Chicago staff have become more actively involved (spent about 50% of their time) in legal enforcement pertaining to day care facilities.

Although the legal staff's general knowledge of legal procedures has enabled DCFS to begin taking action against operators in violation of standards, there are several factors which may hamper their effectiveness. For one thing, many of the present DCFS lawyers have been

employed for less than two years and so have not yet developed specific expertise in licensing enforcement. Also, the legal staff director said that more lawyers are needed downstate, so that attention can be devoted to the enforcement of licensing standards in areas other than Chicago.

Chicago-area licensing workers report that they have been greatly assisted by the involvement of legal staff. The lawyers have been able to explain elements of administrative law to them, including the legal right of day care operators, the limits of the licensing workers' own authority, and the documentation required so that day care case records can serve as court evidence.

Chicago legal staff have visited a few other northern Illinois area offices in order to give seminars to licensing workers. However, such sessions are needed in every area office to explain how legal enforcement procedures can be put into practice. It is recommended that DCFS arrange such sessions between legal staff and licensing workers, especially now when so many new workers have become involved in licensing due to reorganization.

IX. QUALITY AND EFFECTIVENESS

In Chapter I, several attributes of an effective licensing system were set forth. These were examined in Chapters III through VIII. If all of these functions are being performed adequately, the system should achieve certain results, primarily:

absence of child abuse or neglect in licensed day care facilities;

low incidence of unlicensed facilities in operation;

compliance with standards on a day-to-day basis; and

relatively high satisfaction with the system among day care participants (parents, operators and licensers).

This chapter considers the overall effectiveness of the State's day care licensing and regulation system from these perspectives.

Child Abuse in Licensed Facilities

One of the primary objectives of day care licensing is to ensure that the licensed facility provides a minimum level of care for the child. There is no unambiguous definition of what constitutes a minimum level of care. However, at the very least, a minimum level of care should ensure that the child is not subjected to physical abuse or severe physical punishment.

A very direct criterion for evaluating the safeguarding of children is the rate of child abuse in licensed day care facilities. This is, to be sure, a severe criterion, but it reflects an essential index of licensing effectiveness.

Incidence of child abuse. We faced a difficult situation in attempting to gather data on incidences of child abuse in licensed day care facilities. In Illinois during calendar year 1973 there were 941 officially reported cases of abuse[1] of children under six years of age. Summary reports of these cases are maintained at the DCFS office in Springfield, but there is no consistent recorded information about whether the incident occurred in a licensed day care facility. For this information, we had to contact each local DCFS office in the state.

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[1]An officially reported child abuse case is one reported to the Department of Children and Family Services under the criteria set forth by the amended Abused Child Act of 1974. Appendix IX-1 contains these criteria.

Day care centers posed a problem. In many cases, more than 10 staff worked in a center, and it was not feasible to check staff rosters against abuse cases, which are filed by the name of the child. Instead, abuse reports were examined for indications that the abuse occurred in a licensed center, and protective service workers were asked about their knowledge of such cases. For the period from July 1969 to March 1974, only one case of suspected child abuse in a licensed day care center was found. Accordingly, this section focuses on child abuse in licensed day care homes.

For day care homes, the search procedure was relatively straightforward. Names of licensed operators were cross-checked against the names of admitted and suspected abusers. Also, in most of the smaller offices, the protective service or day care licensing personnel knew of such cases and were able to direct us to them. Eighteen cases of reported child abuse in day care homes were found between 1969 and 1974. In 1973 there were eight. In other words, one out of every 2013 children enrolled in day care homes last year was abused. These might seem like good odds compared to, say, the probability of being injured while riding in a car, but for parents of the abused children this may be cold comfort.

Of the total 18 cases of abuse, 13 were "alleged" and five were "admitted" cases of abuse.[1] In four of the cases the day care parents abused their own children, which presumably reflects on the way they might treat other children. The eighteen cases included nine in which the abuser was the day care mother, three (including one alleged pistol-whipping) in which the abuser was the father, and six in which the abuser was another child.

In those cases where the abuse was committed by a day care child, either the day care mother was not providing adequate supervision or some other standard was in violation. For example, one abuse occurred when two children were allowed to nap in the same bed, a violation of the standards.

Preventive action by licensers. We sought to determine if the licensing representative could, by observing the day care home family during her inspection visits, detect a warning sign that might indicate a potential for abuse in the home.

Of the 18 abuse cases, three pre-abuse visits did indicate that the family situation required more frequent visits or that only minimal child care was provided. For the other homes, typical licenser comments taken from DCFS case records included: "I feel the day care

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[1] An "alleged" case is one in which a report of suspected abuse is filed but the suspected abuser does not admit the abuse. The distinction between an alleged and an admitted case is not always clear. In one alleged case, an infant died from a skull fracture which investigators think was caused by an older child striking him. The mother would admit only that she was out of the room at the time of the incident.

mother will provide good care for any children left in her home, and she always shows a good deal of concern for the needs of her own children as well as day care children," and "both parents could provide good physical and emotional care."

For homes in which abuse occurred, the median time between the last home visit and the abuse incident was nine months. Although a comparison is difficult, the 405 homes which we surveyed were visited approximately once every seven months. This indicates that "abusive" homes tend to be less closely supervised than average. In fact, the magnitude of difference in supervision between abusive and nonabusive homes is probably understated, because we do not know if abusive homes would have been visited even as often as once every nine months if the abuse had not occurred. This appears to reinforce the recommendation in the previous chapter regarding more frequent visits.

In ten cases, the day care home did not remain licensed. Nine of the licenses were surrendered voluntarily. In the other case, the day care mother lost her license because she moved, and licenses are not transferable. It is not known if she reapplied.

In five of the remaining eight abusive homes, the home was placed under closer supervision or had new restrictions imposed. This was done by increasing the number of visits by a licensing representative, reducing the number of children the day care mother could care for, or restricting the children to a certain age. In these cases, the licensing representative felt that the new restrictions plus increased monitoring would ensure adequate care for the children.

In three of the day care homes where suspected abuse occurred, the licensing representative neither recommended increased visits nor imposed other restrictions. In these cases, the licensing representative felt the day care mother was still capable of providing good care. In one case where the day care mother was suspected of abusing her own child, the licensing representative felt that the mother would abuse only her own children. In a case where a child was the suspected abuser, no action was taken because the licensing representative felt that the abuse was not due to culpable lack of supervision by the day care mother. In the third case, where abuse was committed by the day care parent to a day care child, the home had been monitored once every two months before the abuse but, curiously, switched to quarterly visits after the abuse incident.

Implications. The day care home standards require that the licensee be a "stable, responsible, mature individual of reputable character who can exercise good judgment in caring for children." This standard has been described by some licensers and licensees as being intangible and unenforceable because of its nonspecific nature. Although the standard is subjective, it is useful in that it does allow the licensing representative an official basis for making more frequent monitoring visits.

This suggests that, while standards should generally be made more specific, licensers should still be allowed some discretion.

Also, in all but one of the cases, the abusive day care homes were in compliance with standards relating to physical attributes of the home, including health and safety factors. Although physical standards may be more important in protecting the child from accidental bodily harm, it appears that the personal qualities of the caregiver are more important in safeguarding the day care home children from abuse. Although most of these reported abusers were not detected on the basis of personal characteristics, it might be possible to do so at some later date. And of course, it is not known how many potential abusers applied for licenses and were screened out.

There are two major problems in the current system which need improvement to strengthen the ability of licensing to safeguard children. First, because of the way the abuse reporting system is set up, it is very difficult for the licenser to check on whether an applicant for a license has a past history of reported child abuse. For one thing, the thousands of abuse file folders are alphabetized by the last name of the abused child, and each folder would have to be inspected to ascertain the name of the suspected or admitted abuser. A child abuser could move from one part of the state to another and become a day care operator without the licensing representative knowing of her past abuse record.

Second, it is possible in larger offices for a child abuse situation to be acted upon without its becoming known that the abuser was a day care operator. In larger offices the unit which deals with child abuse frequently does not communicate much with the licensing section.

One way to help correct these problems would be to implement a computerized central information system containing lists of reported child abuse and lists of licensed day care operators. This system should be cross-referenced by name of the abused child, the name of the abuser, and the address. This would allow for cross-checking with day care center records. Thus, a licensing representative would be able to cross-check an applicant for a day care license against a list of reported abusers, or child abuse investigators could readily determine whether the abuser currently or in the past had a license. Such a system would not only improve the licenser's performance; it would also, hopefully, lead to an overall improved system for safeguarding children.

Unlicensed Day Care Facilities

One important measure of the effectiveness of a day care licensing program is the extent to which unlicensed facilities are operating. It was beyond the scope of this study to examine thoroughly the question of unlicensed day care facilities. This would have required a costly search process, but still might have failed to identify many

unlicensed operators. In the Windows on Day Care study, it proved exceedingly difficult to locate and interview unlicensed day care home operators. As one of the collaborating groups reported, "We have met with total resistance in our assignment to view unlicensed day care homes." However, we have attempted to estimate the magnitude of the problem in Illinois.

Unlicensed operations are generally regarded to be more likely for day care homes than centers, since a center is usually too visible in the community to avoid licensing. In a national survey, the Westinghouse Learning Corporation found that 94% of the day care centers (defined as more than seven children) were licensed or in the process of being licensed. But only 2% of the day care homes were licensed. However, as of 1971, 11 states did not require day care home licensing, so these percentages may be too high for Illinois, which has been licensing child care facilities since 1933.

IEFC staff estimates. The IEFC staff obtained a rough estimate of the number of Illinois children in unlicensed facilities using data from a variety of sources--including the Illinois Department of Public Health, the City of Chicago, the Westinghouse survey and the IEFC staff surveys. Appendix IX-2 contains a description of the computations. It appears that there are approximately 152,500 children under six of working mothers cared for by unrelated persons, and 100,600 of these children are cared for in licensed day care facilities. Thus, approximately 51,900 are cared for by unlicensed persons.

This estimate may be low for several reasons. For example, the total number of children cared for by unrelated persons did not include children of nonworking mothers, single parent families with male head of household, and children of students. Thus, even given the benefit of several doubts, it appears that day care licensing, particularly home licensing, is not effective in preventing unlicensed operations. This conclusion was reinforced through interviews with licensing staff. Although they deal almost exclusively with homes and centers which are or wish to be licensed, they estimated that more than 50% of the eligible homes and not quite 5% of the eligible centers are unlicensed.

Publicity needed. A major problem is that the definition of what constitutes a day care home which should be licensed is not widely known. Some licensers, for example, have told us they have never seen regulation 5.20, which states that facilities providing ten or more child care hours per week must be licensed. It seems safe to assume that many private citizens are unaware of this requirement. At the very least, the definition of what constitutes a day care home should be spelled out in the new standards and any future amendment to the Child Care Act.

Increased public visibility of the legal definition of a day care home is needed. Also, while some local DCFS offices had on occasion

placed articles relating to day care licensing with local newspapers, more effort is needed on a statewide basis to increase public awareness of the need for licensing and of the advantages of licensing.

Some of the techniques which could be used are radio, television and newspaper ads, contact with community groups, and development and distribution of informational pamphlets or posters. These activities should be geared to: (1) letting people know that a license is required for child care providers; (2) explaining how to contact DCFS licensing offices; and (3) helping the public become informed and responsible day care consumers.

Several licensing workers suggested that a licensing number should be listed in the "day nurseries" section of the Yellow Pages of each local telephone directory. Another suggestion made by licensing workers related specifically to unlicensed facilities. To find out about illegally operating facilities, day care licensing workers sometimes call telephone numbers advertised in local newspapers and ask for the facility's license number. This procedure should be followed regularly and follow-up contacts established to try to get illegal facilities licensed or closed.

Newspapers should be asked not to allow child care ads to be placed without asking for the DCFS license number. Advertising by unlicensed facilities is a direct violation of the 1969 Child Care Act. If an unlicensed facility has been advertising and refuses to apply for a license, prosecution should be undertaken.

Additional staff requirements. It should be noted that an increase in the number of day care homes which are licensed would necessitate an increase in the number of licensing staff. Table IX-1 below shows the number of additional full-time licensing staff which would be needed to deal with increased numbers of licensed homes. This table shows that if the 5000 new day care homes were to be licensed (slightly more than twice the current number), at least 33 new staff would be needed, which would require nearly $365,000 in additional money for annual salaries alone. Such an increase would raise the percentage of children under six cared for by an unrelated person in a licensed facility from the current 66% to 80%.

Unlicensed homes constitute a major problem. This may reflect in part the fact that the Department seems to attach more importance to center licensing and allocated fewer resources to home licensing. In this regard it is worth noting that we found a higher turnover rate for home licensing staff than for center licensing staff. Manpower and organizational support are needed if the problem of unlicensed homes is to be seriously addressed.

Table IX-1. Additional FTE staff and money required if unlicensed homes were licensed.

Total Number of New Homes to Be Licensed	Percent of Children Involved	Increased Staff Required	Additional Money for Salaries
500	67%	3.38	$ 36,936
1000	69	6.76	73,008
1500	70	10.14	109,512
2000	71	13.51	145.908
2500	73	16.89	182,412
3000	74	20.27	218,916
3500	76	23.65	255,420
4000	77	27.03	291,924
4500	78	30.41	328,428
5000	80	33.78	364,824

Note: The computations assume that there are about 51,900 children in unlicensed facilities and that each newly licensed home would absorb an average of 4.18 of these children. Calculations are based on the current system (4831 licensed homes, 21.7 FTE home licensing staff, a median caseload of 148 homes, and an average salary of $10,800).

Licensing Standards in Actual Practice

Given that a day care facility is licensed and that a licensing representative makes periodic visits to monitor compliance with standards, it is still an open question whether the facility adheres to the licensing standards on a day-to-day basis. Evidence from the paired-observers study showed that even in day care centers which were recommended for continued licensing an average of six individual standards were found in noncompliance.

To examine the question of the maintenance of standards in actual practice, a spot-check was performed on some of the standards for a sample of licensed day care centers. Furthermore, since our staff could not be specially trained as day care licensers, we decided to concentrate our efforts only on standards which were very tangible and required a minimum of interpretation, for example, child/staff ratios and space per child. We did not attempt to judge such things as quality of program or characteristics of operators.

A description of the spot-check method and procedures is given in Appendix I-1. Sixty-eight centers were spot-checked on nearly three dozen items listed in the day care center licensing standards. Twenty of these items are presented below in Table IX-2, along with the percentage of centers found to be in noncompliance. To provide a point of comparison, the percentage of noncompliances for similar items found by day care licensing staff in the paired-observers study is also given where possible.

Most of the centers had possessed a license for more than seven years and many had received three inspection visits from licensing representatives within the last year. Still, nearly one center in six was found to have a child/staff ratio violation, one in eight did not have enough toilets for the children enrolled, nearly one in ten did not have enough cribs or cots, and about one in five did not provide enough outdoor space. Such violations might all stem from overenrollment (which was not examined in the spot-check study). However, violations relating to diaper-changing, clearance of staff references, the provision of an adequate first-aid kit, and a protected outdoor play area were also relatively frequent.

On the average, the spot-checked centers were found to have 4.5 violations. Data from the paired-observers study (see Chapter V) also demonstrate that noncompliances exist in licensed facilities. For all day care centers visited, the average number of noncompliances with individual standards was 9.6. For homes the average was 4.8. (There were more noncompliances for centers because more items were checked.) In response to our survey, centers with more violations did not recommend as many DCFS visits during the first year a center is licensed as did centers with fewer violations. Centers with more spot-check violations had also received more visits from the licensing representatives during the previous year. Perhaps licensing representatives assigned to these centers were responding with closer supervision to situations which they, too, perceived as having more violations.

It is interesting to note that even though the centers visited in the paired-observers study were different ones than those spot-checked, some of the same standards were observed to be relatively frequently violated--e.g., child/staff ratios and staff records. The question is what to do about standards which are violated by, say, at least one in every ten centers. It is not likely that the licensing standards will be relaxed. They will probably continue to become more stringent, which could simply generate more violations. This is especially true for child/staff ratios, which might be lowered in the near future but are already frequently violated.

There are several choices: These violations could be ignored, or a greater effort could be made in the enforcement of standards. As pointed out in Chapter VII, current monitoring efforts are not adequate. More frequent visits, especially unannounced interim visits, are called for.

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Table IX-2. Standards to be found in violation in the spot-check study.

Standard	Percentage of Centers in Noncompliance	
	Spot-Check Study	Paired-Observers Study
Personal articles of children (including toothbrushes, combs, and washcloths) individually marked	33%	*
Menu posted and dated one week in advance	32	15%
At least 75 square feet of outdoor play space/child available	22	5
Three "cleared" references on file for each staff member	22	18
Proper child/staff ratio	18	35
Outside play equipment includes climbing apparatus	15	*
Outdoor play area enclosed and protected	13	5
Cribs and cots two feet apart	12	*
Adequate number of toilets	12	8
Adequately furnished first aid kit available	10	*
Diapers changed at individual cribs, not central place	10	*
Eating utensils and dishes sterilized or sanitized	10	0
Adequate number of cribs and cots	9	10
Disposable cups or drinking fountain provided for children	9	3
Individual lockers or separate hooks and shelves for each child's garments at a level the child can reach	7	5
Medical exam reports on file for each staff member	7	18
At least 35 square feet of indoor activity space/child available	4	3
Name, address and phone number of person to whom child is to be released in case of emergency is on file for each child	3	13
Milk or fruit juice served during meals or snacks	2	
Number of individual child records or files equals number of enrolled children	0	*

*No directly comparable item available.

Licensing as Perceived by Participants

One important indicator of the desirability of a public program is the attitude toward the program of those who participate in it. In the case of day care regulation, "participants" include day care facility operators and the parents of day care children as well as licensing representatives.

The IEFC staff sought participants' perceptions on three basic questions relating to effectiveness:

1. Should the State abandon regulation or take a less active role in regulating day care facilities?

2. Are parents satisfied with licensed facilities?

3. Would parents be just as willing to place their children in unlicensed as licensed facilities?

Homes. Day care home operators, parents and licensers were asked to express their opinions regarding two proposals: (1) for the State to no longer regulate day care homes in any way and (2) for the State to adopt a less intensive form of regulation through "registration." In the registration model, no license would be required, homes would register with the State and not be inspected prior to registration. Registered homes would be inspected once a year. Responses to questions about these proposals are given in Table IX-3.

Table IX-3. Day care home operators, parents and licensers responses to two alternative licensing proposals.

	Respondent		
	Operators	Parents	Licensers
Agreement with a proposal for State not to regulate day care homes in any way:			
Strongly Disagree	53%	50%	49%
Disagree	23	29	20
Neutral/Undecided	12	13	18
Agree	8	5	8
Strongly Agree	4	3	5
Number of Respondents	369	285	65
Favoring a proposal for State to register but not license day care homes:			
Yes	25%	18%	*
No	75	82	*
Number of Respondents	328	347	*

*Not surveyed on this item.

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Table IX-3 shows that only 12% of the day care home operators, 8% of the parents, and 13% of the licensers agreed with a proposal for the State to no longer regulate day care homes. It is somewhat curious that 13% of the licensing staff (or about one in eight) agreed with a proposal for the State to no longer regulate day care homes in any way. Since it is their job to regulate day care homes, one might wonder how motivated they are to perform their duties if they feel that homes should not be subject to any form of State regulation.

Some observers have contended that parents in metropolitan areas such as Chicago are less likely to want or support day care licensing because of the complexities of regulation in these areas. Our results contradict this point of view.

For parents, there were significant differences in mean levels of agreement with this proposal by region. However, the Chicago and East St. Louis regions showed the lowest levels of agreement with this proposal, while the Southern Illinois and Joliet regions showed the highest levels of agreement. (For further details on these regional differences, see Appendices IX-3, IX-4 and IX-5.)

Parents and operators were invited to briefly explain their answers to the "registration" question. Appendix IX-6 gives a sample of some of these responses. Parents who favored registration believe that an annual inspection would be sufficient or that it is primarily the parents' responsibility to inspect a home. Parents who did not favor registration most often stated that they were concerned that a home would not be inspected for quality of care before accepting children or that they preferred as much protection for their children as possible through licensing.

Day care home parents were also asked how satisfied they were with the care given in the home in which their children were enrolled. Their responses were:

Not satisfied at all	0%
Slightly satisfied	2
Satisfied	15
Very satisfied	82

The above result compares favorably with the finding in the Westinghouse Survey that 61% of the working mothers were "very well satisfied" with the care given in day care homes and suggests that the licensing system is at least screening out most grossly unsatisfactory facilities

Parents were asked if they would place their children in an unlicensed day care home. Thirty-seven percent said yes. Spontaneous comments in relation to "yes" answers for this question included:

". . . just because a close friend has not applied for a license, would not change my opinion about the care she would give."

". . . if I knew the person on a personal basis."

"If I couldn't (find) any other."

". . . I'd be more willing to leave my child if the place had a license to show me."

Other parents who answered "no" to this question indicated that they had also tried unlicensed homes for their children and preferred licensed facilities.

Centers. Table IX-4 presents responses to a proposal to no longer regulate day care centers in any way. This table shows even stronger disagreement with deregulation than Table IX-3.

Table IX-4. Day care center operators, staff, parents and licensers responses regarding a proposal for the State to no longer regulate day care centers.

Level of Agreement	Respondents			
	Operators	Staff	Parents	Licensers
Strongly Disagree	76%	67%	68%	84%
Disagree	17	27	19	14
Neutral/Undecided	4	4	6	2
Agree	1	0	3	0
Strongly Agree	2	2	4	0
Number of Respondents	395	158	319	62

Day care center parents were asked how satisfied they were with the program in the center where their children were enrolled. Their responses were:

Not satisfied at all	1%
Slightly satisfied	3
Satisfied	23
Very satisfied	74

Finally, 88% of the day care center parents said they would not place their children in an unlicensed day care facility. Again, parents who said they would use an unlicensed facility, said they would do so only under special circumstances, such as when no licensed facility was available or when they personally knew the caregiver.

Summary

From the evidence presented in this chapter, we can come to a few general conclusions about the quality and effectiveness of the present day care licensing program. First, the incidence of child abuse in licensed facilities does not seem to be very high in absolute numbers; however, this is somewhat inconclusive for three reasons:

(1) because of record-keeping deficiencies in DCFS, we may not have located all the cases;

(2) even a small number of child abuse cases may be "too many"; until DCFS sets some specific objectives, it will be difficult to say whether the system is doing well or not; and

(3) child abuse is a fairly severe criterion; there are certainly other conditions, such as neglect, which are equally damaging to children, but which we were not able to examine.

In terms of unlicensed facilities, the present system appears to be ineffective, especially in the area of unlicensed day care homes. We estimate that from one-third to one-half of the children in day care homes (as defined by law) are in unlicensed homes.

We found a number of violations of standards in our spot-check study, which leads us to believe that standards are not strictly adhered to in the daily operation of day care facilities. The needs for increased manpower, better training, and more aggressive enforcement--which together should alleviate this condition--have been discussed in other chapters.

We found fairly high overall satisfaction with the current licensing system among program participants. Operators, parents and staff, by three-to-one majorities in all cases, disagreed with a proposal that the State no longer regulate day care facilities. Substantial majorities of parents indicated that they would not place their children in unlicensed facilities. The findings in this chapter suggest that high value is placed on State regulation of day care facilities by day care consumers and providers, but that the State may not be doing all it can to meet the expectations implied by that opinion.

X. CONCLUSION

This chapter will first review the major recommendations made throughout the report, mentioning some of the benefits of each. It will then consider several alternatives to the current system. The chapter will conclude with a discussion of factors which may influence the need for State regulation of day care facilities in the future.

Review of Recommendations

In this report, the IEFC staff has made a number of recommendations for improving the current day care licensing and regulation program in Illinois. These fall roughly into four groups:

> Those intended to ensure that standards are applied uniformly by all licensers across the state. These include a training program for licensing representatives (Chapter III), a licensing manual (Chapter V), redesigned appraisal forms (Chapter VI), and a State Coordinator of Licensing (Chapter III).
>
> Those which would enable day care consumers to play a larger role in the monitoring and enforcement process. These include a public relations campaign and a "consumer's guide" (Chapter IV), and public access to licensing appraisal forms (Chapter VII).
>
> Those designed to achieve more effective use of professional personnel. These include increased clerical support and use of volunteers and paraprofessionals to assist licensing representatives (Chapter III).
>
> Those which would improve the general effectiveness of monitoring and enforcement. The major recommendation in this group is that more visits be made and additional licensers be hired if necessary. Others are a computerized information system, especially a child abuse file (Chapter IX), unannounced interim visits (Chapter VII), and a concerted effort to reduce the number of day care homes operating without licenses (Chapter IX).

Continuing evaluation needed. Regardless of whether all of the recommendations in this report are adopted, there is a clear need for ongoing evaluation of the day care licensing program. Issues such as those raised in this study should be examined regularly by the responsible DCFS program managers and executives.

As noted in Chapter III, there is no coherent statement of goals and objectives for the State's day care regulation program, and it is recommended that DCFS prepare a State plan. This is much needed to

provide a meaningful framework for DCFS program managers--and for the General Assembly--in making decisions about the State's day care licensing and regulation program.

The plan should, first, estimate the future level of need for day care services in Illinois and what that will mean for State regulation of day care. It should also establish goals for the program.

Some means of measuring goal attainment should be part of the plan. For example, in attempting to measure how well children are safeguarded in licensed day care facilities, the IEFC staff looked at the incidence of child abuse (Chapter IV)--a rather extreme measure. Certainly there are less severe conditions, such as neglect, which might be harmful to children as well. In the State plan, DCFS should develop some reliable and practical indicators for all program goals.

Once these measures are found, DCFS should establish objectives, or intended levels of performance. For example, DCFS should specify what is an "acceptable" number of child abuse cases in licensed day care facilities and what is an "acceptable" level of nonuniformity of standards application by licensers.

Finally, the plan should identify the resources that will be needed to implement the plan. This includes adequate manpower, as well as organizational support--travel reimbursement, training and so on.

Alternative Approaches

A fundamental question is whether the goals of State regulation could be better achieved through an alternative system or major innovations which would replace or augment the current licensing system This section will consider three such possibilities: complete deregulation, registration rather than licensing of day care homes, and peer evaluation of facilities.

Deregulation. One somewhat drastic alternative to the current licensing and regulation system would be to abandon it altogether. In that case, the State would no longer be responsible for regulating day care facilities in any way. Complete deregulation would place the burden of responsibility for quality day care on the providers and consumers of the services. Facilities would be subject to free market self-regulation.

This alternative would save the entire cost of the current system, and would, of course, make all of its deficiencies moot. However, any attempt to deregulate entirely would probably meet substantial resistance. In our surveys, overwhelming majorities of operators and parents indicated opposition to deregulation. Many, in fact, expressed a desire for more intensive regulation. There is a strong belief among program participants that State regulation plays an important part in assuring quality care and protection for children. Moreover, the national trend is for most states to license both homes and centers. Only Mississippi does not license either.

There is a practical consideration as well. Figures on total federal aid for day care in Illinois are not available, but the Department of Public Aid alone receives over $12 million. Four state agencies (OSPI, DCFS, DMH, DPA) together spent over $40 million in FY 1974 on purchase of day care services. Since federal guidelines require that much of this money be spent only in licensed facilities, much of it might well be lost to the State if licensing were discontinued.

Registration of homes. Another alternative would be for the State to register, but not to license, day care homes. Within DCFS, there has been discussion of a registration system which would have the following characteristics:

> home operators would register with DCFS and would indicate that they had read the standards and intended to comply with them;
>
> no initial inspections would be made, but all homes would be inspected at least once a year to ensure that standards were being met; and
>
> violations might be punishable by fines.

This option could result in some cost savings, and its proponents assert that it might also induce more home operators to submit to regulation.

However, this approach has a number of disadvantages. First, operators could misrepresent their compliance with standards at initial registration, so there would be no way to be sure children were adequately protected. The longer period before initial inspection could increase the probability of undetected substandard conditions. Also, the DCFS representative would have less information upon which to make decisions about standards compliance.

In addition, according to our surveys, both operators and parents were opposed to this change by at least three-to-one ratios. Some operators told us they valued the State license for its prestige. For a sample of parents' responses, see Appendix IX-5.

Registration has not found support in other States. Our survey of other States indicates that most have either adopted or are moving toward full licensing for day care homes. Only two States reported having a registration system for day care homes.

If this alternative is to be pursued by DCFS, it should be done first in a pilot project, perhaps including a few counties, to determine its overall impact on the quantity and quality of day care provided. Even a pilot project would require an amendment to the Child Care Act.

Peer evaluation. The idea behind this alternative, recently introduced in the medical field, is basically that professional practices should be subject to review by a group of professional practitioners. In the most extreme case, this would mean that all State licensing personnel would be replaced by committees of a day care professional organization.

However, there appears to be no organization in Illinois which could assume such responsibilities in the near future. In any case, many of the problems which exist under the current system would still remain--what the standards should be, how often facilities should be inspected, what enforcement procedures are appropriate, and so on. In addition, the possibility that the professional association may come to be dominated by a small group who may misuse its power cannot be overlooked.

If a viable professional organization should emerge, however, peer evaluation could be used to supplement the licensing system through an accreditation process similar to that used for educational institutions and hospitals. In those cases the State retains primary responsibility for licensing and regulation, but facilities are also separately accredited as meeting professional standards by the professional association. For both licensers and operators, about 70% were in favor of accreditation for day care centers.

Looking Ahead

There appear to be several trends which, if they continue, may increase the need for day care licensing and regulation, and therefore the resources which the State devotes to that function. These include:

an increasing number of children under the age of six, at least in the short term;

an increasing percentage of working mothers; and

an increasing public acceptance of day care as a legitimate, and even desirable, way to provide care for children.

These factors are reflected in the increase in licenses issued--last year, the number of licensed day care homes increased 16%, and the number of licensed centers increased 10%.

Factors which may limit or decrease the demand for day care and, therefore, for licensing and regulation include:

declining birth rates;

the attitude of some people that out-of-home day care threatens the traditional family structure; and

a possible reduction in federal and State financial support.

Changes in delivery system. In addition, changes in the system of delivering day care would affect the need for State regulation. One such change would be a movement toward provision of day care through the school systems. California schools have experimented with lowering the school age to three years old and operating "preschool" programs in school. Some educators have advocated use of school facilities to care for children before and after regular school hours. Some OSPI officials have occasionally expressed interest in these approaches. Since school facilities are already in place, the major expense might be primarily in teacher or attendant salaries.

Even if this were to happen, the programs would presumably be voluntary, and some parents might still desire private day care facilities. In addition, facilities would still be needed for children under three, and some state regulation would be needed.

Another potential change in day care delivery, which has not yet been formally proposed in any State as far as we know, is "full-time parent care." Some experts have pointed out that job training programs for low-income mothers do not solve a family's financial problems, particularly if the family must purchase child care arrangements in order to participate.

If a participant in such a program earns $5000 per year, and has to pay $1800 or $2000 for child care, it is not clear that the family or society is much better off. Therefore, it has been suggested that instead of placing mothers in training programs and buying day care, the mothers could be paid to stay home and provide full-time care until the children reach school age. Child development training would be offered to the mother.

This alternative has three major limitations. First, while an entry-level job may not pay very much, if a career ladder leading to well-paying jobs exists, the mother would be denied access to it. Second, some women (for example those with professional skills) would be able to earn enough outside the home to pay for quality day care. Finally, there are many conscientious parents who need to get out of the house sometimes, and a job affords them this opportunity. Therefore, participation in any such program would certainly involve only a fraction of parents.

If the idea of full-time parent care were to be implemented on any sizeable scale, though, it would cause the demand for day care facilities to level off or decline. However, there would still be at least some need for continued State regulation of day care facilities.

Conclusion

This evaluation of the Illinois day care licensing and regulation program has generated a considerable amount of data and many insights into the functioning of the current system. Our findings generally show that the program is inadequate in a number of respects when considered in terms of (1) criteria set forth by statute and regulations, (2) the goals and expectations of program administrators and participants, and (3) comparisons against other states and federal guidelines.

Improvements in most areas are not only highly desirable, but should also be possible to implement. Most of these improvements will require cooperation and commitment from both the DCFS central administrators and the licensing staff in area offices. Support from the legislature will also be necessary where changes in the Child Care Act are needed, and where appropriations are called for.

It is hoped that efforts will occur to involve parents and private organizations more in the overall process. To the extent that parents in particular take a more active role in monitoring the quality of care, the power of the consumers will probably increase, and so will the quality of day care.

Improving the licensing and regulation system and increasing the availability of quality day care will not be easy. Those involved should keep in mind that the resource they are protecting is perhaps our most important one--our children.

APPENDICES

APPENDIX I-1

DAY CARE HOME AND CENTER SURVEYS

Summary of Response Rates

Listed below are the initial and final sample sizes, number of respondents, and response rate for each of the five major surveys conducted in this study. Unless otherwise noted, mail surveys were administered using a random sample. For all mail surveys, prepaid, addressed envelopes were provided for respondents.

Type of Respondent	Population	Initial Sample Size	Undelivered (Incorrect Address)	Number Delivered	Number Returned	Response Rate for Delivered Surveys
Day Care Home Operator	4,831[1]	1,000	19	981	405	41%
Day Care Home Parents	8,294[2]	579	10	569	287	50
Day Care Center Operator						
Personal Interview		100	--	100	91	91
Mail Survey		910	13	897	343	38
Total	1,823[1]	1,010	13	997	434	44
Day Care Center Staff	11,749[2]	232	--	232	167	72
Day Care Center Parents	78,057	700	27	673	324	48

1. Based on data provided by the Department of Children and Family Services for the number of licensed facilities as of March, 1974.

2. Estimated based on the results of our surveys of day care home and center operators.

Day Care Home Surveys

Operator surveys. From each local Department of Children and Family Services office, we obtained a systematic random sample of approximately one-fifth of the licensed care homes under their jurisdiction. From the 4,831 licensed day care homes we obtained a sample of 1,000. A five-page survey was mailed to the 1,000 operators. Nineteen surveys came back due to incorrect address. Of the 981 surveys which were delivered, 405 (41%) were at least partially completed and returned.

Request for parents' names. In addition to completing the surveys, day care home operators were also asked to return the names and addresses of the parents of children in their home so that the parents could be "asked some of the same questions we have asked you." Forty-one percent of the operators supplied the names and addresses of parents. A comparison of the operators who supplied parents' names versus those who did not revealed that there were no statistically significant (using a $p < .05$ two-tailed criterion) differences between the two groups on 41 of 48 variables tapped in the survey. More importantly, there were no significant differences between the two groups on the policy issues of length of time a license should be good for, minimum number of inspection visits which should be made to day care homes each year, the dividing line between homes and centers, maximum age for own children not to be counted in the number of children cared for, registration and a proposal for the state to no longer license day care homes, importance of different people in monitoring a day care home for quality of care, perceived need for day care in own community, and the need for State assistance beyond licensing.

In comparison to the operators who did not supply parents names, those who did were found to: care for more unrelated children and more children altogether, report that children remain enrolled longer in their home on a full-day basis, report having a friendlier relationship with day care home licensing representative, less frequently report that they knew a State license was required when they first started, more frequently choose the DCFS licensing representative as the person to provide consultation beyond minimum standards, and more frequently list changes in the standards.

Parent surveys. Operators furnished us with the names and addresses of 569 parents (or in the case of a mother and father, sets of parents) to whom we mailed copies of a three-page survey. Ten mailouts were returned due to incorrect addresses, and 287 surveys were at least partially completed and returned by parents.

Parent-operator correlations. Since day care home parents and operators were surveyed on several of the same items, it was possible to correlate their responses. This was accomplished by using the mean of a set of parents' scores for an item and pairing it with an operator's score for

for that item. On the item referring to the length of time children remain enrolled in the home, the correlation between operator and parental responses was .56 ($p < .01$). This result provides support for the validity of responses for "factual" items. On one "opinion" item--agreement with a proposal for the state to no longer regulate day care homes--the correlation was also significant ($r = .31$; $p < .01$). Thus, it appears that the sample of parents could have been biased on this issue, if operators who supplied parents' names had been different from those who did not on the same item. On the other hand, the correlation for the item dealing with the minimum number of yearly DCFS licensing visits was not significant ($r = .041$).

On the following pages are some of the items which appeared on the survey questionnaire for day care home operators and parents. The number of respondents and statistics are based on all day care home operators who at least partially completed and returned the questionnaire.

The statistics presented were generated through the use of the IBM version of the SPSS (Statistical Package for the Social Sciences) computer routine.

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[1]Unless otherwise noted, all significant levels are based on two-tailed tests.

Selected items and statistics from the day care home operator questionnaire.

Question Number	Item		Number	Percent	Mean	Standard Deviation
1	Number of months you have had a State license.		385		121.50	276.71
2	Are you currently licensed to run a day care home?		396			
		YES		98		
		NO		2		
	How many children are you licensed to care for?		388		4.51	1.88
		1		1		
		2		14		
		3		17		
		4		22		
		5		15		
		6		16		
		7		4		
		8		10		
3	If you currently care for children, how many:					
	of your own (or related children) do you care for?		313		1.60	1.51
	children not related to you, do you care for?		315		3.33	2.13
	Total number of children cared for?		306		4.92	2.45
	How many children would you like to care for?				6.50	5.29
4	Do you accept:					
	Infants?		335			
		YES		84		
		NO		16		
	Severely handicapped children, including those who have a handicap which warrants special facilities or care?		293			
		YES		14		
		NO		86		
	Mentally retarded children?		297			
		YES		21		
		NO		79		

Appendix I-1 (continued)

			Number	Percent	Mean	Standard Deviation
	Emotionally disturbed children?		302			
		YES		23		
		NO		77		
5	How long does average child remain enrolled in a home on a full-day basis?		300			
	Less than 3 months			3		
	Three months to six months			10		
	Six months to one year			26		
	One year to two years			29		
	More than two years			33		
6	Average weekly fee charged for full-day child		309		19.92	.30
	Region 1 Chicago		78		24.19	6.16
	Region 2 Joliet		10		20.50	2.84
	Region 3 Rockford		29		19.16	3.85
	Region 4 Peoria		20		19.73	3.47
	Region 5 Champaign		44		20.01	3.06
	Region 6 Springfield		29		17.43	4.06
	Region 7 Southern Illinois		61		16.63	4.21
	Region 8 East St. Louis		36		19.67	5.02
7	Number of times during 1975 a Department of Children & Family Services Licensing Representative visited your home?		391			
		0		11		
		1		40		
		2		29		
		3		13		
		4		5		
		5		1		
		6		1		
		More than 6		0		
9	Does your current DCFS licensing representative seem to be a strict enforcer of standards?		368			
		Not at all		8		
		Slightly		6		
		Some		26		
		Very much		60		
10	Does your current licensing representative seem to be knowledgeable about child development?		360			
		Not at all		2		
		Slightly		2		
		Some		21		
		Very much		75		
11	Do you have a friendly relationship with your current licensing representative?		354			
		Not at all		5		
		Slightly		10		
		Some		31		
		Very much		54		
12	When you first started to care for other people's children, did you know that a State license was required to run a day care home?		390			
		YES		62		
		NO		38		
13	When you first started, did you know who to contact to apply for a State license?		387			
		YES		61		
		NO		39		

Appendix I-1 (continued)

		Number	Percent	Mean	Standard Deviation
15	After you applied for a license, how long was it before a DCFS licensing representative made her first inspection visit to your home?	366			
	Less than 1 week		13		
	1-2 weeks		32		
	2-3 weeks		17		
	3-4 weeks		12		
	1-2 months		10		
	2-3 months		5		
	3-4 months		3		
	4-5 months		2		
	5-6 months		0		
	6 months - 1 year		3		
	More than 1 year		2		
20	Do you feel that the State should provide technical advice and consultation to licensed day care homes to help them deal with special problems and to help them improve their programs beyong minimum standards?	374			
	YES		71		
	NO		29		
	If YES, who do you think should provide the service?	285			
	A DCFS special consultant on early childhood education		44		
	The DCFS day care licensing representative		44		
	A representative from the Office of the Superintendent of Public Instruction		6		
	Other		9		
27	Another proposal is for day care centers to serve as a resource center for nearby day care homes in a sort of "satellite system." Thus, the center might provide program advice and perhaps even resource material such as musical equipment or toys to the satellite homes. Do you think this is a:	369			
	Good idea		43		
	Fair idea		14		
	Poor idea		20		
	Don't know		23		
29	In this community, do you see a need for more, fewer, or the same number of day care facilities for:				
	Full-day care--	289			
	More		56		
	Same number		36		
	Fewer		8		
	Part-day care--	274			
	More		58		
	Same number		38		
	Fewer		4		
	After school care--	277			
	More		61		
	Same number		33		
	Fewer		6		
	Infant care--	276			
	More		74		
	Same number		23		
	Fewer		3		
	Care for mentally retarded children--	269			
	More		73		
	Same number		23		
	Fewer		4		
	Care for physically handicapped--	268			
	More		72		
	Same number		25		
	Fewer		3		
	Care for emotionally disturbed--	273			
	More		75		
	Same number		22		
	Fewer		3		

Appendix I-1 (continued)

Selected items and statistics from day care home parents survey.

Question Number	Item		Number	Percent	Mean	Standard Deviation
2	How many children are in this day care home?	1	280	63	1.58	1.19
		2		27		
		3		4		
		4		2		
		5		2		
		6		2		
3	How long has your child (or oldest child if more than one) been enrolled in this home?		287			
	Less than 3 months			7		
	3 to 6 months			17		
	6 months to 1 year			25		
	1 year to 2 years			28		
	More than 2 years			22		
6	Did you know that this home is visited at least once a year by a State Department of Children and Family Services' licensing representative to make sure that standards are being met?		286			
		YES		87		
		NO		13		
10	Have you read the State standards for licensed day care?		282			
		YES		20		
		NO		80		
14	In your community, do you see a need for more, fewer, or the same number of day care facilities for:		248			
	Full day care--					
	More			81		
	Same number			19		
	Fewer					
	Part-day care--		242			
	More			73		
	Same number			25		
	Fewer			2		
	After school care--		241			
	More			71		
	Same number			27		
	Fewer			2		
	Infant care --		237			
	More			82		
	Same number			16		
	Fewer			2		
	Care for mentally retarded children--		209			
	More			73		
	Same number			25		
	Fewer			2		
	Care for physically handicapped--		209			
	More			75		
	Same number			23		
	Fewer			2		
	Care for emotionally disturbed--		207			
	More			79		
	Same number			20		
	Fewer			1		

Day Care Center Surveys

From DCFS we obtained a complete list of the 1823 licensed day care centers. A simple random sample of 1010 operators was selected. From six regions,[1] a random subset of 100 operators was selected for personal visits by interviewers. An 11-page mail survey was sent to the other 910 day care center operators. Thirteen of these surveys were returned due to incorrect addresses. At least partially completed and returned surveys were obtained from 343 of the operators in the mail-survey condition, and 91 of the operators in the personal visit condition.

On-site visits. When a day care center was visited by an interviewer, the center operator or director was given the 11-page form to complete. After briefing the operator on the questions, the interviewer contacted child care staff who were working in the center that day and distributed copies of a 3-page staff survey to all staff who volunteered to complete it and return it by mail. It was not possible to contact some staff who were busy with the children, and the interviewer was instructed to avoid trying to hand out surveys where it would in any way disrupt child care activities. In all, 232 staff surveys were delivered, and 167 were returned to us at least partially completed.

Spot-check study. One reason for making on-site visits to centers was to spot-check some of the standards. For this purpose, five interviewers viewers were given a 4-5 hour orientation and training and then made trial visits to at least three centers each. Actual spot checks were performed in 71 of the 91 centers visited.

The spot-check method typically consisted of the interviewer walking about the center and making observations in an unobtrusive manner, while the operator filled out her copy of the survey. When the operator completed her form, the interviewer asked to look at the staff and children's records. A letter of authorization for permission to look at these files, written and furnished to us by the Deputy Director of DCFS, was shown to the operator when requested.

Surveying parents. For the centers which were visited by interviewers, a request was also made to obtain a systematic random sample (using every fifth set with a random start) of parents' names and addresses for children enrolled in the center. Of the 91 center operators who completed the survey forms, all but 7 granted the interviewer permission to select the parents sample. Surveys were sent to 700 sets of parents (or single parent, if only one name was available). Twenty-seven surveys were returned due to incorrect addresses. Three hundred and twenty-four day care center parents surveys were at least partially completed and returned.

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[1] The Joliet and Rockford regions were excluded because of the increased travel costs which would have been incurred in making on-site visits in those regions.

Mail surveys versus personal visits. A comparison of the personal interview versus the mail survey sample for center operators revealed that the difference between the two groups was not statistically significant for all but four variables examined in this report. In contrast to the mail respondents, center operators receiving personal visits, on the average, indicated that: they viewed themselves slightly less important and day care center children more important in monitoring the quality of care given in the center; more different types of state personnel visited their facility (1.89 to 2.32); and they felt that slightly more inspection visits should be made during the first year (2.45 to 2.22). On the whole, then, mail survey respondents--who are represented by a much lower response rate (38% as compared to 91%) did not seem to be much different from the personally visited operators. Thus, it does not appear that the use of a mail survey produced a biased sample of day care center operators.

Parent-staff-operator correlations. As with day care homes, it was possible to correlate the responses of day care center parents with staff and operators on certain items.

On the item referring to the length of time children remained in the center on a full-day basis, the correlation between parent and operator responses was significant ($r = .41$ $p < .01$). The operator-parent correlation for how much time parents typically spend in the center each week was also significant ($r = .29$, $p < .05$). Further support for the validity of factual items comes from an examination of correlations for items dealing with special parent-staff meetings to discuss the child's progress and activities. The correlations between staff and parent responses were significant for: an item dealing with whether such meetings were held ($r = .57$, $p < .01$); how long such meetings typically lasted ($r = .50$, $p < .05$); and how often such meetings were held ($r = .67$, $p < .01$). On the other hand, there were no significant correlations between parents, operators, or staff on the minimum recommended number of yearly DCFS licensing visits or for a proposal for day care centers to no longer be licensed.

Appendix I-1 (continued)

Selected items from the day care center operators survey.

Question Number	Item			Number	Percent	Mean	Standard Deviation
2	Do you accept infants?						
			YES	427	9		
			NO		91		
1	Number of children enrolled in your center who are:						
	Infants	Full-day		431		.55	3.50
		Part-day		431		.18	1.29
	2 year olds	Full-day		426		2.70	5.17
		Part-day		429		.72	2.68
	3 year olds	Full-day		425		7.24	10.72
		Part-day		427		8.20	14.34
	4 year olds	Full-day		426		8.68	13.06
		Part-day		414		12.69	18.47
	5 year olds	Full-day		426		4.56	8.92
		Part-day		425		4.06	8.30
	6 year olds or older	Full-day		427		3.47	11.01
		Part-day		428		1.52	5.61
	Percent of all enrollees who are:			394			
			Boys		51		
			Girls		49		
3	Do you accept severely handicapped children, including cerebral palsy, blind, and deaf, or children whose circumstances because of a handicap warrant special facilities or care?			413			
			YES		20		
			NO		80		
	How many severely handicapped children are currently enrolled?			430		1.52	6.55
4	Do you accept mentally retarded children?			404			
			YES		31		
			NO		69		
	How many mentally retarded children are currently enrolled?			432		3.12	11.58
5	Do you accept emotionally disturbed children?			404			
			YES		40		
			NO		60		
	How many emotionally disturbed children are currently enrolled?			431		1.08	5.16
6	Average length of time a child remains enrolled in your center on a full-day basis:			339			
	a. Less than 3 months				1		
	b. 3 months to 6 months				2		
	c. 7 months to 1 year				29		
	d. 1 year to 2 years				44		
	e. More than 2 years				24		
7	Standard weekly fee charged for a full-day care child*			266		19.61	11.77
	By Region: 1. Chicago			139		23.73	12.82
	2. Joliet			11		15.48	9.80
	3. Rockford			18		15.83	8.14
	4. Peoria			23		13.17	8.88
	5. Champaign			18		18.36	10.93
	6. Springfield			18		13.67	7.18
	7. Southern Illinois			21		13.08	7.09
	8. E. St. Louis			18		17.18	7.06
	Is the basic weekly fee the same for each child?			322			
			YES		56		
			NO		44		

*These statistics are based only on those centers which charge a fee. Forty-five centers surveyed did not charge parents.

Appendix I-1 (continued)

		Number	Percent	Mean	Standard Deviation
8	If NO, does the basic weekly fee depend on family income?	170			
	YES		51		
	NO		49		
	If NO, does the basic weekly fee depend on the number of children from a family?	157			
	YES		71		
	NO		29		
9	Approximately what percent of your center's total income comes from fees paid by the day care parents?	372		69.90	40.87
11	What is the total number of full-time equivalent staff who work with children in your center?	413		6.42	8.00
12	How much difficulty have you had in hiring staff?	414			
	a. None at all		50		
	b. Very little		25		
	c. Some		20		
	d. Quite a bit		5		
	Extent to which lack of qualified applicants has been a problem in hiring staff.	157			
	a. No problem		44		
	b. Minor problem		40		
	c. Serious problem		16		
	Extent to which low salaries has been a problem in hiring staff.	168			
	a. No problem		22		
	b. Minor problem		36		
	c. Serious problem		42		
13	Does your center provide transportation to or from child's home?	409			
	YES		25		
	NO		75		
14	Number of months center has had a license.	398		89.15	109.06
15	Number of visits received by DCFS licensing representative during last 12 months.	414		2.41	2.16
	0		8		
	1		30		
	2		26		
	3		17		
	4		9		
	5		3		
	6		4		
	7		5		
	8		1		
	More than 8		2		
17	To what extent do you perceive your current DCFS licensing representative to be a strict enforcer of standards?	402			
	1. Not at all		1		
	2. Slightly		2		
	3. Some		19		
	4. Very much		78		
18	To what extent do you perceive your current DCFS licensing representative to be a person who is knowledgeable about child development?	408			
	1. Not at all		0		
	2. Slightly		2		
	3. Some		19		
	4. Very much		78		
19	To what extent do you perceive your current DCFS licensing representative to be someone who shares your views about child development?	403			
	1. Not at all		1		
	2. Slightly		3		
	3. Some		22		
	4. Very much		75		

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Appendix I-1 (continued)

		Number	Percent	Mean	Standard Deviation
20	To what extent do you have a friendly relationship with your current DCFS licensing representative?	406			
	1. Not at all		2		
	2. Slightly		5		
	3. Some		26		
	4. Very much		67		
21	When your center first started, were you aware that a State license was required to operate a day care center?	280			
	YES		93		
	NO		7		
22	When the center was first started, did you know who to contact to apply for a State license?	273			
	YES		91		
	NO		9		
24	When your center was first getting its license, to what extent was the DCFS licensing representative helpful to you in developing your Program?	280			
	1. Not helpful at all		3		
	2. Slightly helpful		7		
	3. Helpful		25		
	4 Very helpful		65		
25	From the time that you initially requested to have your facility inspected for a license, approximately how long was it before a DCFS Licensing Representative made her initial inspection visit?	244			
	1. Less than 1 week		18		
	2. 1-2 weeks		36		
	3. 2-3 weeks		19		
	4. 3-4 weeks		14		
	5. 1-2 months		7		
	6. 2-3 months		3		
	7. 3-4 months		2		
	8. 4-5 months		0		
	9. 5-6 months		0		
	10. 6 months-1 year		1		
34	Do you feel the State should provide technical advice and consultation to license day care centers to help them deal with special problems and to help them improve beyond minimum standards?	408			
	YES		91		
	NO		9		
	If YES, who do you think should provide such a service?	377			
	1. A DCFS special consultant on early childhood education.		66		
	2. The DCFS Licensing Representative.		21		
	3. A representative from the Office of the Superintendent of Public Instruction.		5		
	4. Other (describe _____).		8		
35	Has your center had any difficulty in meeting fire or building code regulations?	420			
	YES		19		
	NO		81		
36	Would you like to see more detailed, specific fire standards developed by the State for Day Care Centers?	409			
	YES		30		
	NO		39		
	Undecided		31		
44	Another proposal is for day care centers to serve as a resource center for nearby day care homes in a sort of "Satellite System." Thus, the center might provide program advice and perhaps even resources materials such as musical equipment or toys to the satellite homes. Do you think this is a:	412			
	1. Good idea		44		
	2. Fair idea		16		
	3. Poor idea		24		
	4. Don't know		16		

Appendix I-1 (continued)

		Number	Percent	Mean	Standard Deviation
48	On the average, how much time per week do a typical child's parents spend in your center (including bringing the child in and taking him or her home)?	370			
	1. Less than 15 minutes		44		
	2. 15 to 30 minutes		25		
	3. 30 to 45 minutes		11		
	4. 45 to 60 minutes		11		
	5. 1 to 2 hours		5		
	6. More than 2 hours		3		
49	Do you think the State or some other entity should establish some type of formal certification system for Day Care Center operators?	341			
	YES		57		
	NO		43		
50	Do you think the State or some other entity should establish some type of formal certification system for child care workers (staff which might include certain college course work or special training requirements)?	374			
	YES		61		
	NO		26		
	Don't know		13		
	If YES, should the certification system be:	251			
	1. Mandatory--that is, required of all day care staff?		51		
	2. Voluntary?		39		
	3. Other (specify _____)?		10		
51	Do you feel that day care centers should be accredited (for example, classified as offering custodial, developmental, or early childhood education-oriented care; or classified by "quality of child care given")?	346			
	YES		69		
	NO		31		
53	Do you feel that you have too many State people coming into your center, for whatever purpose (e.g., licensing, evaluation, funding, inspection, etc.)?	390			
	YES		11		
	NO		89		
55	In this community, do you see a need for more, fewer, or the same number of day care facilities for:				
	1. Full day care	327			
	1. More				
	2. Same number		54		
	3. Fewer		41		
			5		
	2. Part-day care	272			
	1. More				
	2. Same number		34		
	3. Fewer		58		
			8		
	3. After school care	293			
	1. More				
	2. Same number		67		
	3. Fewer		29		
			4		
	4. Infant care	283			
	1. More				
	2. Same number		73		
	3. Fewer		24		
			3		
	5. Care for the mentally retarded children	257			
	1. More				
	2. Same number		59		
	3. Fewer		40		
			1		

Appendix I-1 (continued)

	Number	Percent	Mean	Standard Deviation
6. Care for the physically handicapped.	248			
1. More		59		
2. Same number		41		
3. Fewer		0		
7. Care for emotionally disturbed	268			
1. More		69		
2. Same number		30		
3. Fewer		1		

Selected items from the day care center staff survey.

Question Number	Item	Number	Percent	Mean	Standard Deviation
1	Are you:	167			
	Male		3		
	Female		97		
2	Are you:	163			
	Married		70		
	Single		30		
3	How long have you worked at this center?	167			
	Less than 3 months		5		
	3 to 6 months		16		
	6 months to one year		19		
	1 to 2 years		22		
	More than 2 years		38		
5	Were you aware that this center is visited by a State licensing representative from the Department of Children and Family Services to ensure that licensing standards are met?	167			
	YES		97		
	NO		3		
7	Have you read the State standards for licensed day care centers?	163			
	YES		22		
	NO		78		
16	On the average, how much time per week do a typical child's parents spend in your center (including bringing the child in and taking him or her home)?	158			

Appendix I-1 (continued)

		Number	Percent	Mean	Standard Deviation
	Less than 15 minutes		51		
	15 to 30 minutes		23		
	30 to 45 minutes		9		
	45 to 60 minutes		10		
	1 to 2 hours		3		
	more than 2 hours		4		
19	In this community, do you see the need for more, fewer, or the same number of day care facilities for:				
	Full-day care--	134			
	More		50		
	Same number		45		
	Fewer		5		
	Part-day care--	123			
	More		37		
	Same number		58		
	Fewer		5		
	After school care--	122			
	More		66		
	Same number		31		
	Fewer		3		
	Infant care--	124			
	More		74		
	Same number		24		
	Fewer		2		
	Care for the mentally retarded--	117			
	More		71		
	Same number		29		
	Fewer		0		
	Care for the physically handicapped--	117			
	More		68		
	Same number		32		
	Fewer		0		
	Care for the emotionally disturbed--	117			
	More		72		
	Same number		28		
	Fewer		0		
20	Do you feel the state should provide technical advice and consultation to licensed day care centers to help them deal with special problems and to help them improve their programs beyond minimum standards?	156			
	YES		92		
	NO		8		
	If YES, who do you think should provide such a service?	136			
	A DCFS special consultant		67		
	The DCFS day care licensing representative		18		
	A representative from the Office of the Superintendent of Public Instruction		14		
	Other		1		

Appendix I-1 (continued)

Selected items from the day care center parents survey.

Question Number	Item		Number	Percent	Mean	Standard Deviation
2	How many of your children are enrolled in this center?		315			
		1		85		
		2		12		
		3		2		
3	How long has your child or oldest child, if more than one, been enrolled in this center?		322			
	Less than 3 months			8		
	3 to 6 months			17		
	6 months to 1 year			39		
	1 year to 2 years			23		
	more than 2 years			13		
8	Have you read the State standards for licensed day care centers?		316			
		YES		17		
		NO		83		
10	Were you aware this center is visited at least once a year by a State Department of Children and Family Services licensing representative to make sure that standards are being met?		316			
		YES		74		
		NO		26		
16	On the average, how much time do you spend in your center (including bringing the child in and taking him or her home)?		289			
	Less than 15 minutes			31		
	15 to 30 minutes			26		
	30 to 45 minutes			15		
	45 to 60 minutes			13		
	1 to 2 hours			9		
	More than 2 hours			7		
19	In this community, do you see a need for more, fewer, or the same number of day care facilities for:		250			
	Full-day care--					
		More		67		
		Same number		32		
		Fewer		1		
	Part-day care--		240			
		More		59		
		Same number		37		
		Fewer		4		
	After school care--		234			
		More		70		
		Same number		27		
		Fewer		4		
	Infant care--		226			
		More		74		
		Same number		22		
		Fewer		4		
	Care for mentally retarded--		214			
		More		75		
		Same number		24		
		Fewer		1		
	Care for physically handicapped--		210			
		More		74		
		Same number		25		
		Fewer		1		
	Care for emotionally disturbed--		214			
		More		77		
		Same number		21		
		Fewer		1		

APPENDIX I-2

GLOSSARY

AFDC -- Aid to Families with Dependent Children.

child/staff ratio -- the number of children per staff in a day care center

day care center -- a place in which more than eight children, unrelated to the operator, are cared for during all or part of a day.

day care facility -- a day care home or center.

day care home -- a place in which eight or fewer children, unrelated to the operator, are cared for during all or part of a day.

DCFS -- Illinois Department of Children and Family Services

DMH -- Illinois Department of Mental Health

DPA -- Illinois Department of Public Aid.

DVR -- Illinois Division of Vocational Rehabilitation.

"exempt" age -- the age at which a day care home operator's own children would not be charged against the home's licensed capacity; presently set at 18 (see Chapter IV).

full-time equivalent (FTE) -- an expression used to translate part-time positions into an equivalent number of full-time positions. For example, two half-time day care licensing positions equal one FTE position.

FY -- fiscal year.

HEW -- U. S. Department of Health, Education, and Welfare.

IEFC -- Illinois Economic and Fiscal Commission

initial licensing study -- the visit or visits made to a day care facility by a licensing representative prior to issuance of the facility's first license (see Chapter VI).

interim visit -- an inspection visit between licensing visits (see Chapter VII).

licenser -- a licensing worker (or licensing representative) working for DCFS.

licensing visit -- the visit made to a day care facility to determine eligibility for licensing or relicensing.

OCD -- Office of Child Development, DCFS (see Chapter VII).

operator -- one who owns, manages or administers a day care facility; includes day care home mothers, day care center administrators, and in some sections of the report, day care center staff.

OSPI -- Office of Superintendent of Public Instruction.

overenrollment -- when the number of children in a day care facility is greater than the number for which the facility is licensed.

paired observer study -- an IEFC staff study in which teams of two licensing representatives visited day care facilities in order to test for uniformity of application of standards (see Chapter V).

relicensing -- renewal of a license.

spot-check study -- an IEFC staff study in which IEFC staff physically examined a number of licensed day care centers in roder to observe their adherence to standards (see Chapter IX).

videotape study -- an IEFC staff study in which licensing representatives viewed two videotaped simulated licensing interviews in order to test for uniformity of interpretation of standards (see Chapter IX).

APPENDIX II-1

LABOR FORCE PARTICIPATION RATES OF WOMEN:
1950-1972, BY PRESENCE AND AGE OF CHILDREN

Year[1]	Total	No Children Under 18 Years	Children Under 6 Years	Children 6 to 17 Years Only
1950	26.8	31.4	13.6	32.8
1955	30.6	33.9	18.2	38.4
1960	32.7	35.0	20.2	42.5
1965	35.7	36.5	25.3	45.7
1966	36.4	37.0	26.2	46.5
1967	37.5	36.7	28.7	48.6
1968	38.5	37.6	29.2	49.7
1969	39.5	38.3	30.4	50.7
1970	40.4	38.8	32.2	51.5
1971	40.2	38.4	31.4	52.0
1972	41.1	42.9	31.9	52.6

Note: Percent of civilian noninstitutional population. Inlcudes women who are married, separated, widowed or divorced.

1. Data for 1950-67 include women 14 years old and over; data for 1968-1972 include women 16 years old and over.

Source: Executive Office of the President: Office Management and Budget Social Indicators, 1973, p. 142, Washington D.C. 1973

APPENDIX II-2

ILLINOIS WOMEN IN THE LABOR FORCE
BY MARITAL STATUS AND PRESENCE OF CHILDREN

Employment Status	
Total females, 16 years old and over	4,055,940
Females in labor force	1,756,592
Percent of total	43.3%
Married women, 16 years old and over	
Husband present	322,798
With own children under 6 years	101,173
Percent of these women in labor force	28.9%
With own children 6 to 17 years	99,387
Percent of these women in labor force	50.7%
Other Women	155,245
With own children under 6 years	5,732
Percent of these women in labor force	59.2%
With own children 6 to 17 years	8,353
Percent of these women in labor force	73.6%

Source: Table 53, Employment Status by Race, Sex, Urban and Rural Residence: 1970, U.S. Bureau of the Censers, Census of Population: 1970, General Social and Economic Characteristics, Final Report PC (1)C-15 Illinois

APPENDIX II-3

FAMILIES BY PRESENCE OF OWN CHILDREN UNDER 18 YEARS

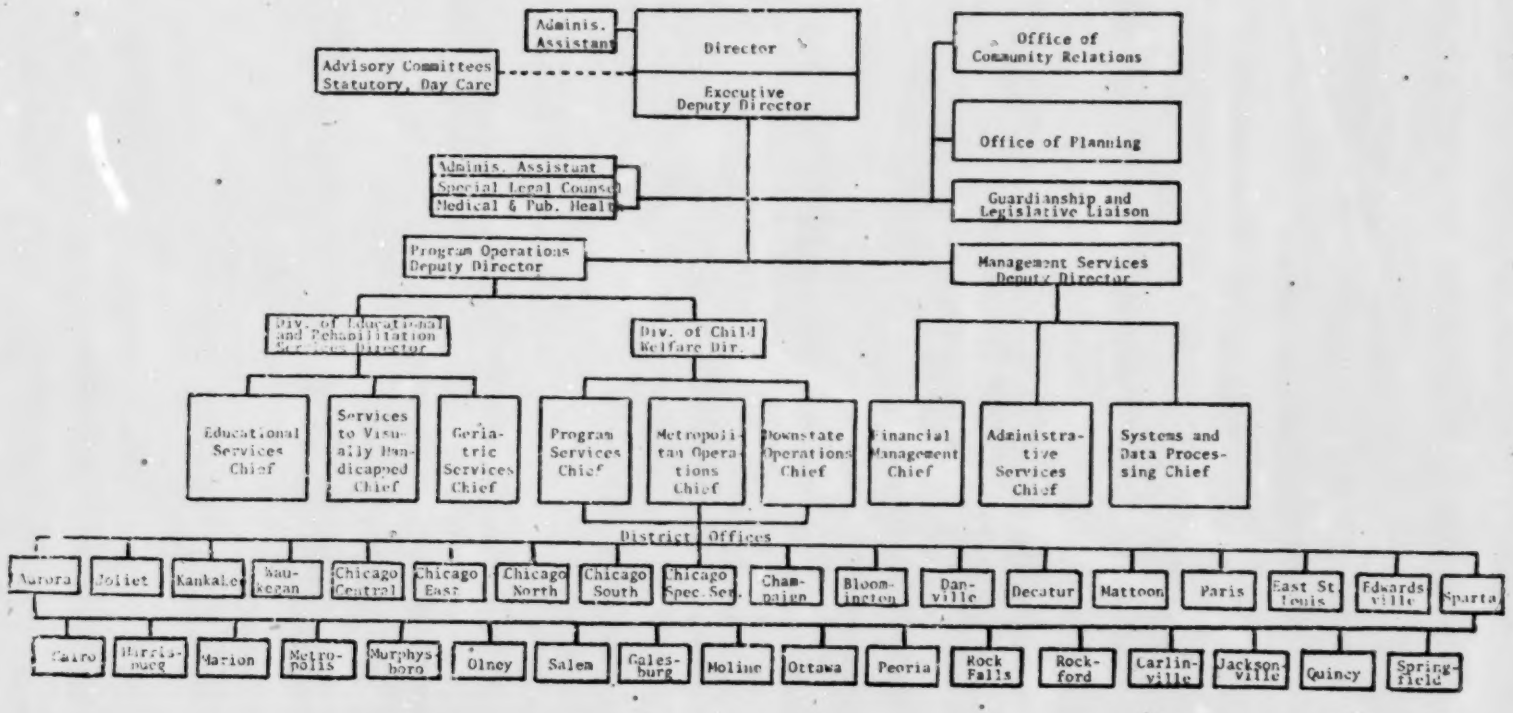
Families by presence of own children under 18 years

Total families		2,794,194
Husband-wife families	(85.9%)	2,402,423
Families with female head	(10.7%)	299,259
Total families with own children under 18 years		1,538,203
Husband-wife families	(87.6%)	1,345,630
Families with female head	(10.6%)	163,051
Total families with own children under 6 years		736,199
Husband-wife families	(89.9%)	662,405
Families with female head	(8.6%)	63,765

Source: Table 59, General Characteristics by Size of Place, 1970, U.S. Bureau of the Census, Census of Population: 1970, General Social and Economic Characteristics, Final Report PC (1) C-15 Illinois.

APPENDIX III-1

DCFS ORGANIZATION CHART PRIOR TO REORGANIZATION



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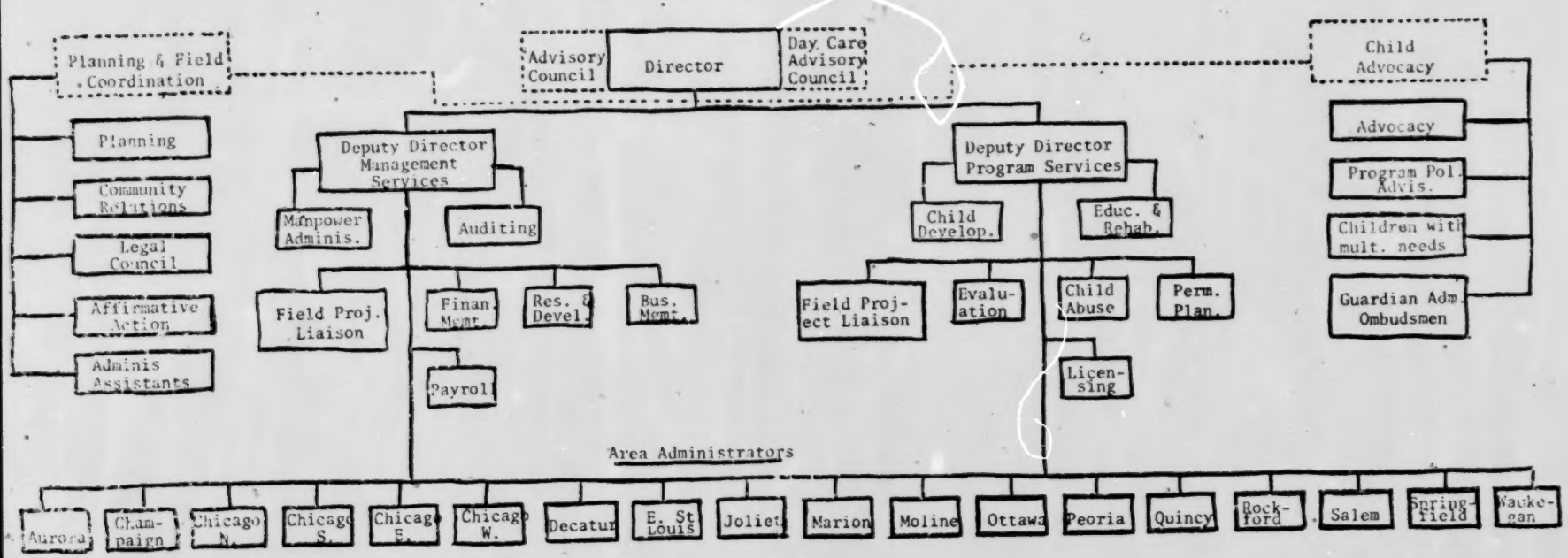
APPENDIX III-2

CURRENT ORGANIZATION CHART FOR DEPARTMENT OF CHILDREN AND FAMILY SERVICES



(Note: Field office and satellite office structure not shown)

APPENDIX III-3

EXTENT TO WHICH LICENSERS AGREE THAT OTHER DCFS PERSONNEL BELIEVE IN THE IMPORTANCE OF DAY CARE LICENSING

DCFS Personnel	SD	D	U/N	A	SA
Central DCFS Administrators	18%	24%	24%	26%	8%
District Administrators	8	17	27	30	19
Day Care Supervisors	2	7	12	35	45
Other staff who license day care	0	13	8	25	54
Other staff who do not license day care	11	37	19	30	3

Note: Data collected in IEFC survey prior to reorganization.

SD = Strongly disagree
D = Disagree
U/D = Undecided/neutral
A = Agree
SA = Strongly agree

APPENDIX III-4

SELECTED ITEMS FROM DAY CARE LICENSING REPRESENTATIVE SURVEYS

Question Number	Item	Number	Percent	Mean	Standard Deviation
10	How many licensed day care homes/centers do you currently carry under your work load?				
	Homes	33		114.73	13.20
	Centers	31		65.03	42.45
11	How many day care home/center applicants do you currently have under study?				
	Homes	30		21.1	21.83
	Centers	27		12.26	19.16
15	On the average how much time (to the nearest half an hour) do you normally spend in a home/center in making:				
	an interm visit?				
	Home	38		1.82	.69
	Center	32		5.37	4.42
	an annual relicensing visit?				
	Home	34		1.21	.48
	Center	32		4.72	2.14
	an interim visit?				
	Home	36		1.61	3.21
	Center	32		2.94	1.62
16	What is the minimum amount of time (to the nearest half an hour) do you think a licensing representative should spend in a home/center in making:				
	an initial study?				
	Home	43		2.16	2.89
	Center	31		6.06	7.95

Appendix III-4 (continued)

		Number	Percent	Mean	Standard Deviation
	an annual relicensing study?				
	Home	42		1.14	.35
	Center	31		4.32	2.80
	an interim visit?				
	Home	41		1.02	.35
	Center	29		2.41	1.70
17	What is the average number of visits you make to a home/center before you issue a license or permit?				
	Home	40		1.62	1.64
	Center	30		3.17	2.94
26	In general, to what extent do you think you are a strict enforcer of standards in your day care licensing role?				
	not at all	63	2		
	slightly		3		
	some		56		
	very much		40		
27	In general, to what extent do you think you are a person who is knowledgeable about child development in your day care licensing role?				
	not at all	66	1		
	slightly		1		
	some		38		
	very much		59		
28	In general, to what extent do you think you are someone who has a friendly relationship with the operator of the day care facilities you license?				
	not at all	58			
	slightly		7		
	some		33		
	very much		60		
29	Approximately what percentage (to the nearest 5%) of the homes/centers you work with have you helped to improve beyond minimum standards:				
	Homes	32		22%	
	Centers	26		31%	
32	In your estimation, what is the most typical way in which day care centers you work with inform parents of a child's progress at the center?	32			
	staff inform parents through casual conversation		84		
	staff inform parents through special meetings between staff and parents		9		
	parents inform themselves by watching child while at the center		3		
	a written report		3		
	other				
33	In your estimation, what is the most typical way in which day care centers you work with inform parents of activities of the centers (such as trips to a park, zoo, new equpiment, new programs, new staff, etc.)?	39			
	staff inform parents through casual conversations with center staff		70		
	staff inform parents through special meetings between staff and parents		6		

Appendix III-4 (continued)

		Number	Percent	Mean	Standard Deviation
	parents inform themselves through personal observation at the center		15		
	parents keep informed through written materials such as a newsletter		9		
	other				
34	What percentage of the home/centers under your jurisdiction do you think would like to see the state provide technical advice and consultation to licensed day care home/centers to help them deal with special problems and to help them improve their programs beyond minimum standards?				
	Homes	39		51%	
	Centers	30		64%	
35	What percentage of the home/centers under your jurisdiction do you think would say that technical advice and consultation should be provided to helpthem deal with special problems and improve programs beyond minimum stadards by:				
	Homes				
	A DCFS special consultant on early childhood education	37		25%	
	The DCFS day care licensing representative	37		45%	
	A representative from OSPI	36		6%	
	Some other agency or person	37		4%	
	Centers				
	A DCFS special consultant on early childhood education	31		15%	
	A DCFS day care licensing representative	31		62%	
	A representative from OSPI	30		3%	
	Some other agency or person	30		8%	
41	If a day care home/center just met minimum standards, do you think this would provide adequate protection for the child?				
	Homes	42			
	Yes		71		
	No		29		
	Centers	35			
	Yes		66		
	No		34		
56	One proposal is for day care centers to serve as a resource center for nearly day care home in a sort of "satellite system." Thus, the center might provide program advice and perhaps even resource materials such as musical equipment or toys to the satellite homes. Do you think this is a:	64			
	good idea?		67		
	fair idea?		25		
	poor idea?		6		
	don't know				
57	Do you think the state or some other entity should establish some type of formal certification system for day care center operator?	45			
	Yes		78		
	No		22		

Appendix III-4 (continued)

		Number	Percent	Mean	Standard Deviation
58	Do you think the state or some other entity should establish some type of formal certification system for child-care workers (staff) which might include certain college course work or special training requirements?	58			
	Yes		84		
	No		7		
	Don't know		9		
	If yes, should the certification system be:	50			
	mandatory--that is required of all day care operators		62		
	voluntary		36		
	other		2		
63	In the area of your licensing jurisdiction, do you see a need for more, fewer, or the same number of day care facilities for:	63			
	Full-day care				
	More		92		
	Same number		8		
	Fewer				
	Part-day care	61			
	More		56		
	Same number		43		
	Fewer		1		
	After school care	62			
	More		95		
	Same number		5		
	Fewer				
	Infant care	62			
	More		90		
	Same number		8		
	Fewer		2		
	Care for mentally retarded children	59			
	More		66		
	Same number		34		
	Fewer				
	Care for physically handicapped	58			
	More		65		
	Same number		35		
	Fewer				
	Care for emotionally disturbed	59			
	More		80		
	Same number		20		
	Fewer				
65	Do you feel that the State should provide technical advice and consultation to licensed day care centers to help them deal with special problems and to help them improve their programs beyond minimum standards?	58			
	Yes		95		
	No		5		
	If yes, who do you think should provide such service:				
	A DCFS special consultant on early childhood education?	51	37		
	A DCFS day care licensing representative?		43		
	A representative from the Office of Superintendent of Public Instruction?		2		
	Other		18		

APPENDIX III-5

AVERAGE PERCENT TIME SPENT BY DAY CARE LICENSERS
IN DCFS FUNCTIONS (1973) AND LICENSING TEAM FUNCTIONS (1974)

During 1973:

DCFS Functions	Average Percent of Time Spent by Day Care Licensers*	
	Homes	Centers
Licensing day care homes	73%	7%
Licensing day care centers	1	85
Licensing institutions	0	0
Licensing foster homes	11	0
Adoptions	3	0
Protective services	5	1
Other	7	7

In 1974 (after reorganization):

Licensing Team Functions	Average Percent of Time Spent by Licensing Team Members**
Licensing day care homes	34%
Licensing day care centers	41
Licensing institutions	1
Licensing foster homes	8
Licensing adoptive homes	1
Protective services	4
Other	11

* Supervisors excluded.

** Licensing coordinators excluded (also group homes and child welfare agencies, since these are licensed by coordinators).

APPENDIX III-6

JUNE 1974 AVERAGE LICENSING WORKLOADS PER TEAM MEMBER BY AREA OFFICE

	Area Office	Number of Team Members*	Number of Licensed Facilities	Average Workload
	Aurora	5	792	158
	Champaign	3	1034	345
	Chicago	8 (homes)	740	93
		12 (centers)	832	70
(3)	Decatur	2	878	439
(1)	East St. Louis	5	853	171
	Joliet	3	555	185
	Lake-McHenry	4	532	133
(5)	Marion	1	589	589
(3)	Moline	2	470	235
	Ottawa	2	492	246
	Peoria	3	566	189
	Quincy	2	476	238
	Rockford	4	954	239
	Salem	2	445	222
(6)	Springfield	3	713	238
			Overall Average:	237

*Licensing coordinators not included.

Note: Numbers in parentheses indicate number of volunteers in addition to team members. Volunteers not included in average workload figure.

APPENDIX IV-1

THE FIFTEEN MOST FREQUENTLY REPORTED STANDARDS WHICH DAY CARE HOME OPERATORS FEEL ARE MOST LIKELY TO BE VIOLATED IN DAY CARE HOMES

	Type of Violation	Percent[1]
1.	Overenrollment (exceeding licensed capacity)	26%
2.	Inadequate meals and poor nutrition	8
3.	Neglect of children or lack of warm, loving care	8
4.	Lack of cleanliness in home (including soiled linens and sheets, dirty floors)	6
5.	Inadequate supervision	4
6.	Lack of general safety in household (including poisons, drugs and cleaning fluids not stored out of children's reach)	3
7.	Homes not licensed	3
8.	Inadequate adherence to fire standards (especially keeping kids in a basement where there is only one exit)	2
9.	Lack of child development program and training	2
10.	Overly harsh discipline or spanking	2
11.	Accepting ill children	1
12.	Insufficient number of beds and/or cots	1
13.	Lack of outdoor play and outings (e.g., to playgrounds, parks, etc.)	1
14.	Insufficient play periods and play areas	1
15.	Diapers not regularly changed for infants and younger children	1

1. Percent refers to percentage of all the 405 day care home operators returning surveys who listed the type of violation.

APPENDIX IV-2

THE FIFTEEN MOST FREQUENTLY REPORTED STANDARDS WHICH DAY CARE HOME LICENSING STAFF FELT ARE MOST LIKELY TO BE VIOLATED IN A DAY CARE HOME

	Type of Violation	Percent[1]
1.	Overenrollment	81%
2.	Overly harsh discipline	16
3.	Incomplete medical forms	12
4.	Incomplete records on children	12
5.	Improper group size for special age groups	12
6.	Inadequate supervision	7
7.	Accepting ill children	7
8.	Absence of child care assistants when needed	7
9.	Inadequate meals and poor nutrition	5
10.	Lack of child development program and training	5
11.	Insufficient play periods for children	5
12.	Inadequate adherence to fire standards	5
13.	Not enough outdoor play	5
14.	Lack of general safety in the home	5
15.	Not enough beds and/or cots	2

1. Percent refers to the percentage of 34 day care home licensing staff members who listed the type of violation.

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APPENDIX IV-3

ITEMS CORRELATED WITH THE LICENSING DECISION
IN THE PAIRED-OBSERVERS STUDY

Using data from the paired-observers study, individual items were scored 1 for compliance and 0 for non-compliance. Positive licensing decisions (e.g., granting or renewing a license) were scored 1, and negative licensing decisions (e.g., denying or not renewing a license) were scored 0.

Each of 76 items on the home appraisal form and each of 164 items on the center form were correlated by means of phi coefficients (Guilford and Fruchter, 1973)[1] with the licensing decision. The items which correlated significantly (using two-tailed tests) with the licensing decision are presented below for homes and centers. All significant correlations were positive.

		Value of Phi Coefficient
Homes		
1.	Rubber or plastic sheets provided for children under 3	.34**
2.	Adequate number of single beds or cots	.30**
3.	Three supporting references supplied for day care home operator	.28*
4.	Name of responsible person, address and phone number available in case of emergency or illness of day care home operator	.27*
5.	Day care home operator has specific plan for handling injury or illness with day care children	.26*
6.	Operator has home insurance which covers day care children	.24*
Centers		
1.	Staff medical reports complete	.62**
2.	Report of required staff health examinations on file	.62**
3.	Space apart provided for removal of children from group with washable toys and equipment easily sanitized or disposable	.57**
4.	Outdoor hard surfaced areas safe	.56**

[1]Guilford, J. P. and Fruchter, B., Fundamental Statistics in Psychology (5th Edition) New York: McGraw-Hill, 1973.

Appendix IV-3 (continued)

Centers (continued)	Value of Phi Coefficient
5. Good personal hygiene is practiced by staff	.54**
6. Special requirements for food handlers are practiced	.53**
7. Number of children enrolled exceeds licensed capacity	.52**
8. Staff are employed according to prescribed qualifications	.50**
9. Careful consideration is given to references with check into character and physical fitness to work with children	.50**
10. General working conditions are supported by work assignments which make it possible to fulfill job responsibilities	.49**
11. Staff coverage provides for a second person readily available to assist with any group	.46**
12. The day care center evaluates and records a child's readiness for admission	.46**
13. Indoor space sufficient for children permitted	.46**
14. Day care center administration shows financial competence to assure administration of standards	.45**
15. Child-staff ratios are maintained as prescribed	.43**
16. Center provides a well-balanced and constructive program	.42**
17. Furnishings and toys are adequately supplied	.42**
18. Furnishings and toys are varied and suitable to ages and ability	.38*
19. Staff records contain three supporting references	.37*
20. General working conditions are supported by supervision and in-service training to develop better skills in child care	.36*
21. Children's records contain entry of date and specific type of accident or illness preventing admission	.35*
22. Drinking water is readily accessible and served from water fountains and/or individual cups	.35*
23. Staff records contain position and date of employment and date and reason for termination of employment	.35*
24. A statement of purposes has been filed with the Department	.35*
25. Children's records contain: written application for admission, list of persons to whom child may be released and names, addresses, and telephone numbers of those to be notified in case of emergency	.35*
26. Children are removed from the group if unable to benefit from type of care offered	.34*
27. Outdoor play space is well-drained	.34*

Appendix IV-3 (continued)

Centers (continued)	Val. of Phi Coefficient
28. Center takes into consideration and deals with special problems and needs of children who are away from their own homes for extended periods	.34*
29. Children's records contain required medical and immunization records or written request for waiver	.33*
30. Center adheres to the provisions of license or permit issued	.33*
31. There are staff assigned to maintain records and prepare required reports	.33*
32. An accurate attendance record on children is maintained	.33*
33. Basic furnishings and equipment include lockers or hooks	.32*
34. Business management and staffing (are sufficient) to assure maintenance of required accounts and records without undue intrusion on child care staff	.32*
35. Children are admitted according to the ability of the center to serve them	.32*
36. Proper lighting is maintained in the center	.32*
37. There are staff assigned to substitute for regular staff when needed	.32*
38. Formal agreements and written consents of parents or guardians are on file	.32*
39. Procedures for dealing with emergency illnesses and accidents are established	.32*
40. Provision is made for storage of personal effects within children's reach	.32*
41. Proper ventilation is maintained in the center	.32*
42. Personnel records contain training, education, experience, and other qualifications	.32*
43. Kitchen facilities are in a separate unit	.32*
44. Outdoor play space adjoins center	.32*

**$p < .01$
*$p < .05$

APPENDIX IV-4

THE PAIRED-OBSERVERS STUDY PROCEDURE

The purpose of the "paired-observers" study was to determine whether two licensing representatives, visiting the same facility at the same time, would report the same violations of standards and make the same licensing decision.

Sixty day care licensing staff members were invited to participate in the study, and forty-nine were able to. Most of the others indicated that heavy workloads, vacations or other conflicts precluded their participation. After licensers indicated their availability, the IEFC staff assigned people to pairs.

Homes and centers to be examined by paired-observers teams were selected by participating licensers from their normal workloads. The licenser who was usually responsible for the facility (the "host") took the major responsibility for contacting and interviewing the operator. The other member of the team (the "guest") was primarily an observer, but was encouraged to ask questions as needed, especially in day care centers. For homes, the paired-observer visit was an initial study; for centers, relicensing studies were made. No paired-observer inspection required more than two visits.

In about two-thirds of the cases, we were able to pair hosts and guests from different regions of the state. Travel expenses were paid by DCFS and overnight expenses, when needed, were reimbursed by IEFC. Licensers were encouraged to reciprocate visits so that each was a host once and a guest once.

Before initiating a paired-observers study, the host tried to provide the guest with relevant background information about the home or center; for example, copies of initial inquiry letters or letters of reference. After the visit was completed, both licensers were asked to independently fill out the appropriate appraisal forms. All center licensers used the CFS-516 appraisal form, and all home licensers used an amended version of the CRO-76 form. Licensers were urged not to discuss their impressions of the facility until the appraisal forms had been filled out and a decision on giving or renewing a license had been made. Copies of the completed appraisal forms were sent to the IEFC project director.

For homes and centers, uniformity of standards application was analyzed by comparing the responses of individuals within a pair for each facility. Within each pair, we examined agreement on items of information contained on the appraisal form, including background and identification material, individual items concerning the standards and the overall licensing decision.

Some licensers cautioned us that our results might be biased because the host would be "tougher" on her own facility than the guest (for a variety of reasons) while other licensers suggested that the guest might be tougher because she did not know the operator well and could thus be more objective. To test whether there were differences between host and guest licensers on standards application, the two groups were compared separately for homes and centers on both the total number of non-compliances and the overall licensing decision. The results of t-tests and χ^2 tests revealed there to be no statistically significant differences between hosts and guests for homes or centers on either variable.

APPENDIX IV-5

PERCENTAGE OF DAY CARE OPERATORS RECOMMENDED SPECIFIED DIVIDING LINE BETWEEN DAY CARE HOMES AND DAY CARE CENTERS

Recommended Dividing Line	Percent of Day Care Center Operators	Percent of Day Care Home Operators
Under 4	1	0
4	6	8
5	9	4
6	65	36
7	0	0
8	1	6
9	0	0
10	16	39
11	0	2
12 and over	2	3
	N = 138	N = 174

APPENDIX IV-6

RECOMMENDED CHILD/STAFF RATIOS FOR DAY CARE CENTERS

Children Under Two	Day Care Center Operators	Day Care Center Staff	Day Care Center Parents	Day Care Center Licensing Representatives
1	1%	4%	10%	0%
2	2	0	40	13
3	45	43	43	36
4	42	33	48	49
5	8	16	4	3
6	0	2		
Over 6	2	2		
Mean	3.78	3.73	3.49	3.40
n(number)	125	49	114	39
SD (standard deviation)	1.56	1.17	.69	.765
Two Year Olds				
1	1			
2	2		4	
3	2	8	3	3
4	19	29	29	33
5	29	40	27	6
6	33	18	35	58
7	3	0		
8		0		
9		0		
10	9	5		
Mean	5.82	5.00	5.02	5.18
n	125	38	104	33
SD	2.27	1.51	1.37	1.02
Three & Four Year Olds				
2			5	0
3		7	2	9
4	2	2	4	9
5	17	38	32	9
6	10	12	12	18
7	5	2	9	9
8	33	24	31	46
9		0	1	0
10	2	2	0	0
11			0	0
12	8	2	4	0

Appendix IV-6 (continued)

Three & Four Year Olds (continued)	Day Care Center Operators	Day Care Center Staff	Day Care Center Parents	Day Care Center Licensing Representatives
13	4	0	0	0
14	0	0	0	0
15	11	10	0	0
Over 15	8	0	0	0
Mean	9.20	6.98	6.31	6.5
n	108	42	81	8
SD	4.17	3.34	2.10	2.07
Five Year Olds				
3	0	3	2	0
4	0	0	2	3
5	2	8	5	3
6	2	4	2	0
7	0	0	0	0
8	3	4	4	0
9	0	0	0	0
10	13	14	11	13
11	0	1	0	0
12	7	10	12	6
13	19	14	12	16
14	0	0	0	0
15	27	21	27	39
16	1	1	1	0
17	3	3	2	3
18	6	6	5	0
19	0	0	0	0
20	14	10	13	16
Over 20	0	1	1	0
Mean	14.03	12.71	12.98	13.6
n	206	72	175	32
SD	3.82	4.80	4.52	4.72
Mentally Retarded				
1	7		3	
2	9	3	6	25
3	57	61	79	38
4	23	21	9	38
5	2	9	3	
6		3		
Over 6	3	3		
Mean	3.24	3.73	2.94	3.12
n	58	33	53	8
SD	1.43	1.70	.66	.85

APPENDIX IV-7

STANDARDS WHICH ARE LIKELY TO BE VIOLATED IN CENTERS--
ITEMS MOST FREQUENTLY LISTED BY DAY CARE CENTER OPERATORS

	Type of Violation	Percent
1.	Child staff ratios too high	16%
2.	Staff poorly qualified and not well trained	9
3.	Inadequate meals and poor nutrition	9
4.	Overcrowding in a center, not enough space	9
5.	Poor programming, lack of concern for total child development	8
6.	Overenrollment	7
7.	Overly harsh discipline, including spanking, locking child in a closet	4
8.	Unclean facilities and premises	3
9.	Fire drills not held	3
10.	Not enough fire exists	3
11.	Poor equipment	2
12.	Inadequate supervision	2
13.	Fire hazards present	2
14.	Not enough toilets	2
15.	Children's medical forms incomplete	1

Note: Percent refers to the percent of the 34 day care center operators listing the item.

APPENDIX IV-8

STANDARDS WHICH ARE LIKELY TO BE VIOLATED IN CENTERS--
ITEMS MOST FREQUENTLY LISTED BY DAY CARE CENTER
LICENSING REPRESENTATIVES

	Type of Violation	Percent
1.	Child staff ratios too high	47%
2.	Overenrollment	35
3.	Poor programming, lack of concern for total child development	29
4.	Inadequate meals and poor nutrition	26
5.	Children's medical forms incomplete	25
6.	Improper group size for special age groups	12
7.	Poor equipment	12
8.	Staff poorly qualified and not well trained	12
9.	No sheets on cots	9
10.	Overly harsh discipline	6
11.	Staff records not current	6
12.	Poor health habits of staff (e.g., not washing hands after changing diapers)	6
13.	Accepting underage children	6
14.	Inadequate supervision	3
15.	Insufficient outdoors play activity	3

Note: Percent refers to the percent of the day care center licensing representatives listing the item.

APPENDIX V-1

PERCENT OF PAIRS IN DISAGREEMENT BY ITEM
FOR PAIRED-OBSERVERS STUDY

Item	Percent of Pairs in Disagreement
Day Care Homes	
Day care home operator has home insurance which covers day care children	36%
Day care home operator requires children have contagion exam prior to placement	33
Day care home operator has requested from parents a list of physical limitations and special medical considerations	33
Appropriate personal medical information given by day care home operator	31
Health requirements met by day care home operator	27
Three supporting references supplied for day care home operator	20
Cribs provided for infants	
Day care home operator indicates she has read the standards and will comply with them	18
Day care home operator agrees to maintain record of each child	16
Protected yard for active play safe from hazards	16
Playground available	16
Nearby park available	16
Outdoor play equipment suitable to age	16
Indoor play equipment suitable to age	16
Rubber or plastic sheets provided for children under 3	16
Fruit juice provided daily to children	13
Single beds or cots available for sleeping facilities	13

Appendix V-1 (continued)

Stairs in day care home have railings	13
Transportation available in case of emergency	13
Specific plan for handling injury or illness provided by day care home operator	13
Dangerous tools stored out of children's reach	11
Children provided training in good health habits	11
Day care home operators inspect children daily for illness	11
Supervised nap period for child in care for more than five hours	11
Individual and adequate bedding available if family beds used for naps	11
Sunny and shaded area for play space	11
Housing free from fire hazard	11

Day Care Centers

Total number of children exceeds licensed capacity	50
Child-staff ratios and groupings maintained as prescribed, according to ages and handicaps of children	39
Special groups provided for mentally retarded and other handicapped children	39
Furnishings and toys for children adequately supplied	30
Menus posted one week in advance	26
Care for individual children with special handicaps	22
Personnel policies and practices stimulate good job performance	22
Special requirements for food handlers practiced	22
Meals or snacks prepared and served as prescribed	22
Space apart, provided for removal of children from group, with washable cots, toys, and equipment easily sanitized or disposable	22
Basic program of well-balanced and constructive activities geared to the ages and developments of levels of children served	17

Appendix V-1 (continued)

Special groups provided for children under 2 years of age	17
Medications administered to children only as prescribed	17
Only animals and pets certified as healthy permitted in center	17
Furnishings and toys for children well constructed and in good condition	17
Good personal hygiene practiced by staff	
Reports of required health examinations of staff on file	17
Staff employed according to prescribed qualifications	13
Careful consideration given to references, with check into character and general fitness to work with children	13
Provisions of license or permit issued	13
License or permit displayed	13
Children supervised at all times in proper ratio to center's ages and groupings	13
Supervision and in-service training to develop better skills in child care	13
Report of prescribed medical exams, tests, and immunizations on file for each child	13
Upkeep of day care center clean and sanitary	13
Fire clearance obtained	13
Clearances from three references, other than family members or other relatives, contained in personnel (staff) records	13
Personnel files contain reports of the required medical examinations and tests	13

Note: Disagreement on an item was defined as a rating of NC (noncompliance) by one licenser and a rating of X (compliance), NA (not applicable), or B (blank; not observed) by the other.

APPENDIX VII-1

EXPLANATION OF CALCULATIONS FOR DAY CARE MANPOWER NEEDED FOR LICENSING

The IEFC staff wanted to calculate approximately how many licensinging staff would be required to monitor the current number of licensed facilities and to license the anticipated number of new applicants during 1974. The analysis is based on the number of visits which must be made, the time required to make visits and the field time available to licensers for making visits.

The field time available to licensers was estimated from data collected during a telephone survey to a sample of full-time licensing workers in June. Licensers were asked to estimate the number of hours out of a typical 37.5 hour week which they devoted to each of the following functions, and their responses were averaged together.

Activity	Average Hours Devoted Per Week
(1) Intake (receiving telephone inquiries from potential license applicants)	5.0
(2) Recording (paperwork associated with licensing)	5.1
(3) Meetings (staff development, departmental)	2.9
(4) Licensing visits (initial, interim relicensing)	15.1
(5) Travel (to and from visits)	5.7
(6) Miscellaneous (reading case records in preparation for visits)	2.9

Thus it can be seen that the licenser spends only about 2½ days in field work and about 2½ days in the office performing other related tasks. As shown above, actual visits and traveling between visits requires about 20 hours per week or a little over 2½ man days (using 7.5 hours per day). The visits alone require 15.1 hours or about 2 man days.

It was necessary to convert average hours spent in making visits into the number of man days which would be required during an entire year. Each year has about 260 working days of which approximately 30 are used by employees for vacation, sick leave or holidays, leaving about 230 man days available for work. Of these, based on the above figures, 40% (two man-days out of every five) would be available for making licensing visits; therefore, 92 man-days would be available for visits during a year.

The next step in the analysis was to consider the types of visits which must be made and the average length of time each requires. This data was provided by licensers in the IEFC survey and is summarized below.

	Homes	Centers
Initial licensing study	(1.6 visits x 1.8 hours)	(3.2 visits x 5.4 hours)
Interim visit	1.6 hours	2.9 hours
Relicensing visit	1.2 hours	4.7 hours

In any given year, the number of initial visits to be made depends on the number of applicants. The number of interim visits depends on the number of licensed facilities, and the number of relicensing visits required will be about half of the number of licensed facilities, since a license is valid for two years. The analysis will be performed four times each for homes and centers, using either 1, 2, 3, or 4 as the number of interim visits desired to be made to each facility.

A simplifying assumption has been made regarding interim visits. At any given time of the year the number of licensed facilities in a licenser's workload changes due to the addition of new licensees and ex-licensees who have dropped out of the system. To include these seasonal variations in the number of facilities requiring interim visits would complicate the analysis beyond the point at which it serves as a useful illustration. Therefore, it has been assumed for the sake of simplicity that all new applicants are licensed at the beginning of the year, and all dropouts will occur at the end of the year. Therefore, interim visits will be required for both new and old licensees all year long.

In January 1973 there were 1823 licensed centers and 4831 licensed homes. The number of new applicants for this calendar year will be estimated based on the applications received during 1973 (the percentage of applications in relation to the total licensed facilities in January of 1973). Thus, the number of applications anticipated for 1974 is 273 for center licenses and 2077 for home licenses. These figures, however, do not allow for any increased efforts to license unlicensed operations. These figures reflect merely the existing rates of increase. Of these applicants, 5% for centers and 6% for homes will not be given a license based on 1973 percentages. Therefore, only 259 new center licenses and 1973 new home licenses are estimated to be issued.

Based upon the previous estimates and assumptions, the following variables were specified for day care homes and centers which would enter into the calculations:

(1) Number of existing licensed facilities in January of 1974 (given).

(2) Number of new applicants anticipated (estimated).

(3) Number of initial studies and total time required (in hours) for applicants (calculated).

(4) Number of relicensing visits required (calculated to be half of licensed facilities) and total time required.

(5) Number of interim visits required to licensed facilities and successful applicants and total time required.

Items 3, 4, and 5 were added together to determine the estimated total time required for visits to facilities in 1974. This total number of hours was divided by 7.5 to get the total number of man-days required for visits. The total number of man-days required was then divided by the total number of visit days currently available (calculated to be 92 per person). Finally, this calculation resulted in the number of full-time workers who would be needed in order to make the specified number of visits to licensed facilities during 1974. The results of the calculations are shown below.

Day Care Centers
1823 licensed facilities
273 new applicants estimated

	Total Hours Required			
	1 Visit	2 Visits	3 Visits	4 Visits
Initial Studies	4641	4641	4641	4641
Relicensing Visits	4286	4286	4286	4286
Interim Visits				
New applicants	0	3397	6794	10,191
Already licensed	2642	5284	7926	10,568
Total hours required	11,569	17,608	23,647	29,686
Number of man-days required	1542	2348	3153	3958
Number of full-time workers required	16.8	25.5	34.3	43.0

Day Care Homes
4831 licensed facilities
2077 new applicants estimated

	Total Hours Required			
	1 Visit	2 Visits	3 Visits	4 Visits
Initial Studies	6023	6023	6023	6023
Relicensing Visits	2899	2899	2899	2899
Interim Visits				
New applicants		7022	14,044	21,066
Already licensed	3864	7728	11,592	15,456
Total hours required	12,786	23,672	34,558	45,444
Number of man-days required	1705	3156	4608	6059
Number of full-time workers required	18.5	*34.3	50.1	65.9

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APPENDIX VII-2

MEAN RANKINGS OF IMPORTANCE IN MONITORING THE QUALITY OF CARE GIVEN IN A DAY CARE HOME

	Respondent					
	Operator		Parents		Licenser	
Importance of:	Mean	SD*	Mean	SD	Mean	SD
Operator	1.83	1.00	2.33	1.07	2.11	1.08
Parents	2.26	.87	2.01	1.02	2.11	1.00
Children	2.94	1.05	2.88	1.13	3.44	1.29
Licenser	2.97	1.11	2.77	1.05	2.32	1.20
Number of respondents	307		273		38	

Note: 1 = most important; 4 = least important. Ranks were derived from mean ranks for each category of respondent.

MEAN RANKINGS OF IMPORTANCE IN MONITORING THE QUALITY OF CARE GIVEN IN A DAY CARE CENTER

	Respondent							
	Operator		Staff		Parents		Licenser	
Importance of:	Mean	SD	Mean	SD	Mean	SD	Mean	SD
Operator	1.80	1.05	2.19	1.21	2.42	1.29	2.08	1.34
Staff	2.83	.98	2.36	1.02	2.48	1.18	2.73	1.31
Parents	3.13	1.09	3.21	1.14	3.07	1.32	3.18	1.02
Children	3.93	1.50	3.85	1.52	3.86	1.34	4.24	1.45
Licensers	3.24	1.47	3.46	1.39	3.18	1.44	2.74	1.20
Number of respondents	343		142		251		31	

Note: 1 = most important; 5 = least important.

* Standard Deviation

APPENDIX VII-3

SELECTED CORRELATIONS FROM THE SURVEY OF LICENSING STAFF

Item	Correlated Items	Correlation
1.	Extent to which licenser perceives herself to have a friendly relationship with licensees:	
	a) Number of centers she denied an initial license to in 1973	-.33*
	b) Number of centers she did not renew a license for in 1973	-.52***
	c) Number of homes in 1973 she felt that the situation called for license denial, suspension, or removal but did not take action for some reason	-.42**
	d) Extent to which she perceives herself to be a strict enforcer of standards	-.27**
	e) Extent to which she believes it is a good idea to work with a day care facility that is just getting started rather than refusing to license it altogether	.39***
2.	Extent to which licenser believes it is a good idea to work with a day care facility that is just getting started rather than refusing to license it altogether:	
	a) Number of homes (corrected for full-time) she denied an initial license to in 1973	-.58***
	b) Number of centers (actual and corrected for part-time) she denied an initial license to in 1973	-.46** (actual) -.93*** (corrected)
	c) Number of homes plus centers (corrected for part-time) she denied an initial license to in 1973	-.92***
	d) Number of homes (actual and corrected full-time) she did not renew a license for in 1973	-.50*** (actual) -.37* (corrected for full-time)
	e) Number of centers (actual and corrected for part-time) she did not renew a license for in 1973	-.37** (actual) -.53*** (corrected)
	f) Number of homes plus centers (actual and corrected for part-time) she did not renew a license for in 1973	-.93*** (actual) -.92*** (corrected) -.30
	g) Extent to which she perceives herself to be a strict enforcer of standards	-.24*

Appendix VII-3 (continued)

Item	Correlation
2. (continued)	
h) Number of homes plus centers (actual and corrected for part-time) she felt that the situation called for license denial, suspension or removal but did not take action action for some reason	-.92*** (actual) -.92*** (corrected)
3. Extent to which licenser perceives her supervisor (coordinator) as standing behind her efforts to enforce standards:	
a) Number of homes plus centers she initiated action that could have led to revocation	.34*
4. Extent to which licenser perceives DCFS central office as wanting her to "develop" a facility, rather than close it:	
a) Number of centers in 1973 she felt that the situation called for license denial, suspension, or removal but did not take action for some reason	.35*
b) Number of centers she felt she helped to improve beyond minimum standards in 1973	.59***
5. Extent to which licenser perceives her supervisor as wanting her to "develop" a facility rather than close it:	
a) Number of centers (actual and corrected for part-time) she denied an initial license to in 1973	-.64*** (actual) -.50*** (corrected)
b) Extent to which she believes it is a good idea to try to develop a facility that is just getting started if it doesn't quite meet standards rather than refusing to license it altogether	.41***
6. Extent to which licenser perceives her supervisor (coordinator) as supporting her efforts to have a license revoked	
a) Number of homes (actual and corrected for part-time) she denied an initial license to in 1973	.40* (actual) .33* (corrected)
b) Number of centers (actual and corrected for part-time) for which she initiated action that could have led to license revocation	.40* (actual) .33* (corrected)

* $p < .10$
** $p < .05$
*** $p < .01$

APPENDIX VIII-1

REVOCATION PROCEDURE

The revocation process can be understood most easily by dividing it into four parts, as indicated on the flow chart (next page) by the dotted lines. The first part consists of the pre-hearing activity. The local DCFS office sends a registered letter calling the operator into the office for an informal conference on the alleged violations of standards. The regional (area) administrator, the licensing workers, the licensing supervisor, and a stenographer are present. A statement of what transpired at the meeting is prepared and signed by those who were present. The operator has 10 to 14 days to comply or to voluntarily give up the license; otherwise DCFS will initiate legal action to close the facility.

An operator who fails to respond to the first letter may be subpoenaed to appear before a formal investigatory panel. At this meeting an attorney is present and testimony is given under oath. The operator is given 14 days within which to comply or to close.

If after the two-week period, the facility continues to operate in violation of standards, DCFS sends notice to the operator of intent to revoke the license. The licensee is given 10 days in which to request a public hearing and statement of charges.

If a public hearing is requested, DCFS legal staff must prepare a letter of notification and assist in getting witnesses. Departmental legal staff say a typical hearing costs between $500 and $1000.

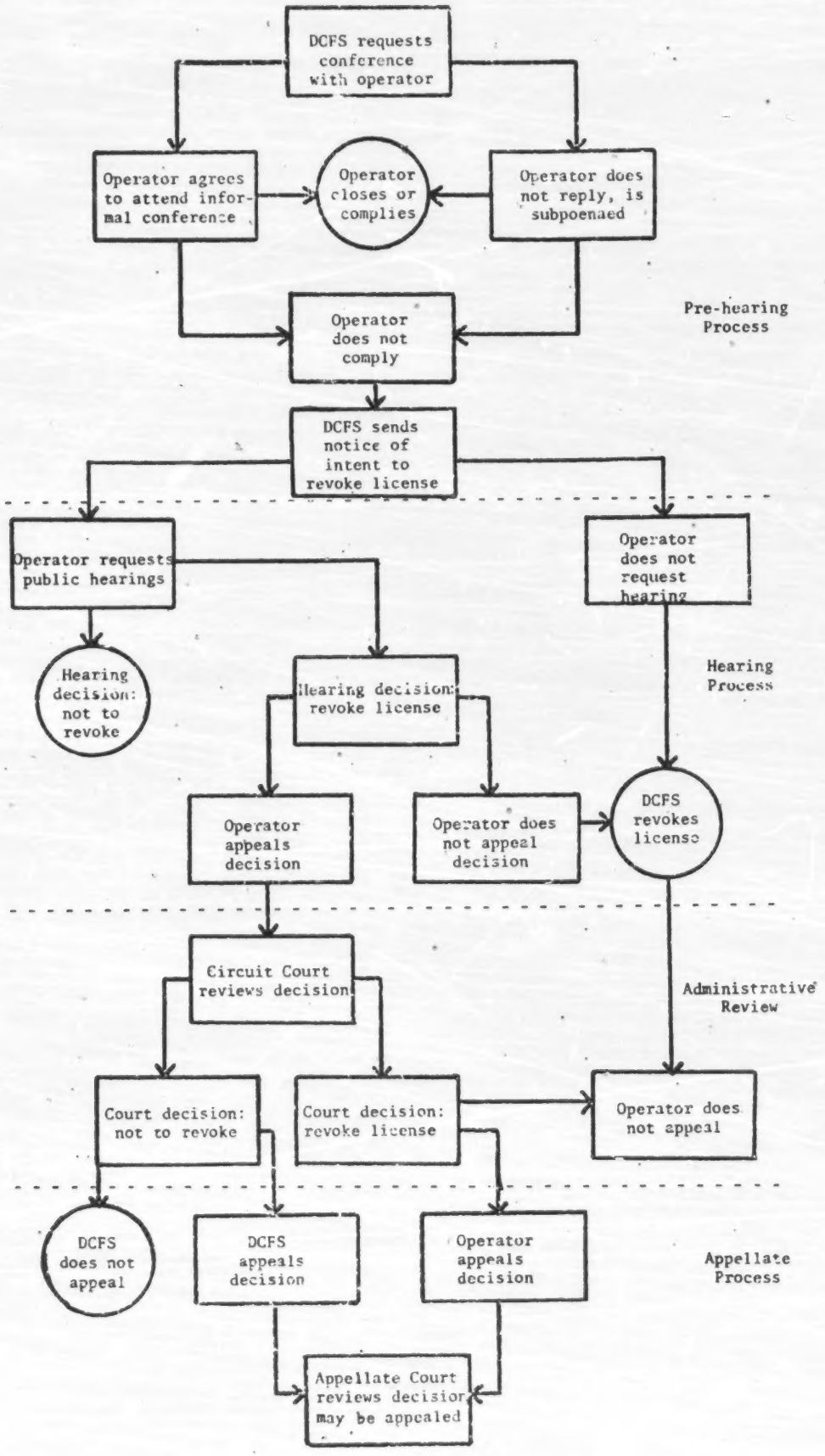
After the hearing is finished, the hearing officer has 45 days in which to present his recommendations to the Director of DCFS. The Director notifies the operator of the decision. If the license is revoked, the operator has 35 days to appeal to the circuit court. These procedures could take up to seven months just to get to this point in the process.

If the operator appeals, the revocation process enters the third stage. The decision to revoke the license will be reconsidered by the circuit court in accordance with the Administrative Review Act.

Should the revocation be upheld, the operator may continue to appeal the decision through regular judicial procedures. If it is not upheld, DCFS may appeal. Thus, the revocation could enter a fourth stage, the appellate process.

After a license has been revoked or voluntarily given up by the operator, DCFS checks to see whether or not children are still being cared for. If so, the case may be referred to the State's Attorney for prosecution as an unlicensed facility.

Appendix VIII-1 (continued)


DCFS requests conference with operator
Operator agrees to attend informal conference
Operator closes or complies
Operator does not reply, is subpoenaed
Operator does not comply
Pre-hearing Process
DCFS sends notice of intent to revoke license
Operator requests public hearings
Operator does not request hearing
Hearing decision: not to revoke
Hearing decision: revoke license
Hearing Process
Operator appeals decision
Operator does not appeal decision
DCFS revokes license
Circuit Court reviews decision
Administrative Review
Court decision: not to revoke
Court decision: revoke license
Operator does not appeal
DCFS does not appeal
DCFS appeals decision
Operator appeals decision
Appellate Process
Appellate Court reviews decision may be appealed

APPENDIX VIII-2

LICENSER'S PERCEPTIONS OF DCFS SUPPORT FOR ENFORCEMENT EFFORTS

In the IEFC licensing staff survey, workers were asked about whether support for enforcement efforts was received from the central office, from administrators and from supervisors. Several interesting findings emerged and are summarized below:

	SD	D	U/N	A	SA
I. Perceptions of support from central DCFS office.					
stands behind your enforcement efforts	13	13	38	21	16
would rather have you try to "develop" a home/center than close it	8	8	37	37	10
supports your efforts to have a license revoked	15	9	47	24	7
II. Perceptions of support from area administrator.					
stands behind your enforcement efforts	7	7	20	43	25
would rather have you try to "develop" a home/center than close it	8	11	23	47	11
supports your efforts to have a license revoked	4	13	35	32	17
III. Perceptions of support from supervisors					
stands behind your enforcement efforts	0	7	11	33	49
would rather have you try to "develop" a home/center than close it	3	11	8	54	23
supports your efforts to have a license revoked	4	9	26	36	25

KEY: SD = Strongly disagree
D = Disagree
U/N = Undecided/neutral
A = Agree
SA = Strongly agree

APPENDIX IX-1

CRITERIA FOR REPORTING CHILD ABUSE
AS ESTABLISHED IN THE AMENDED CHILD ABUSE ACT OF 1973 (Section 2)

"Any physician, surgeon, dentist, osteopath, chiropractor, podiatrist or Christian Science practitioner having reasonable cause to believe that a child brought to him or coming before him for examination, care or treatment, or any school teacher, school administrator, truant officer, social worker, social service administrator, registered nurse, licensed practical nurse, director or staff assistant of a nursery school or child day care center, law enforcement officer, of field personnel of the Illinois Department of Public Aid or the Cook County of Public Aid having reasonable cause to believe that any child with whom they have direct contact has suffered injury or disability from physical abuse, or neglect inflicted upon him or shows evidence of malnutrition, other than by accidental means, or has been subjected to deliberate withholding of feeding endangering his health, and any hospital to which a child comes or is brought suffering from injury, physical abuse, or neglect apparently inflicted upon him or shows evidence of malnutrition, other than by accidental means, shall promptly report or cause reports to be made in accordance with this Act. This Section applies to cases of children whose death occurs from apparent injury, neglect or nalnutrition, other than by accidental means, before being found or brought to a hospital. A child whose parent, guardian or custodian in good faith selects and depends upon spiritual means through prayer alone for the treatment or cure of disease or remedial care may be considered neglected or abused, but not for the sole reason that his parent, guardian, or custodian accepts and practices the aforementioned beliefs."

APPENDIX IX-2

ESTIMATES AND ASSUMPTIONS FOR CHILDREN IN UNLICENSED FACILITIES

The following assumptions were made in estimating the number of children cared for in unlicensed facilities for calendar year 1973:

(1) The total number of children under 6 in Illinois is approximately 1,100,000 (based on a figure furnished by the Illinois Department of Public Health).

(2) Thirty-three percent of children under 6 have working mothers (based on an estimate used in a statistical analysis of day care needs in Chicago by the Mayor's Office of Child Care Sources, 1972).

(3) Of children under 6 with working mothers, approximately 42% are cared for by unrelated persons, including day care homes, centers, kindergartens, and others (Westinghouse Survey, 1970, pp. 178-180). This percentage is probably low, since the working mothers were from households with incomes of $8,000 per year or less. Thus, they may have had a lowered opportunity to purchase day care home or center services compared to working mothers as a whole.

(4) For licensed day care centers, 91% (based on surveys of centers) of the children are under 6. For licensed homes, 85% of the children are under 6 (using estimates provided by licensing personnel based on their licensing records). The lower percentage of children under 6 for homes is mainly due to the fact that a home operator's own children up to age 18 are counted in the number of children cared for.

Making these assumptions and using the total home and center figures in Chapter IX, the following estimates can be made: There are approximately 152,460 children under 6 of working mothers cared for by an unrelated person (i.e., a person that should be giving care in a licensed facility). Also, there are 100,614 children under 6 cared for in licensed day care facilities. Thus, approximately 51,846, or 34% of the total children under 6, are cared for in unlicensed facilities.

Alternatively, if one were to assume that all of these unlicensed facilities were eligible for day care home licensing and that unlicensed homes had the same number of children as licensed homes,[1] then it could be estimated that only about 24% of the children under 6 in day care homes in Illinois which should be licensed are in licensed homes. If one assumed that only 90% of the unlicensed facilities were day care homes, the percentage of children in licensed homes would probably still not be much higher than 28% (depending on the estimated enrollment of the unlicensed centers).

It should be kept in mind that the above estimates of percentage of children under 6 in licensed facilities are probably high for several reasons. To name but a few, the total number of children cared for by unrelated persons did not include children of nonworking mothers, single parent families with male head of household, and children of students (whereas all the children under 6 in licensed facilities were assumed to have working mothers).

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[1]Actually, there may be many unlicensed homes where only one or two children are cared for, which might make the estimate of percentage of unlicensed homes lower than the one given. The Windows on Day Care study reports that unlicensed homes had slightly fewer children than licensed homes.

APPENDIX IX-3

DAY CARE OPERATORS RESPONSES TO PROPOSAL FOR THE STATE TO NO LONGER REGULATE DAY CARE HOMES IN ANY WAY

	Region								
Response	1 Chicago	2 Joliet	3 Rockford	4 Peoria	5 Champaign	6 Springfield	7 So. Ill.	8 E. St. Louis	Overall
Strongly Disagree	61%	50%	50%	45%	58%	44%	49%	52%	53%
Disagree	23	12	16	14	23	23	24	33	23
Neutral/Undecided	7	19	25	9	11	23	13	63	13
Agree	6	12	6	18	8	9	9	6	8
Strongly Agree	3	6	3	14	0	0	4	6	4
n	90	16	32	22	52	34	75	33	369
Mean	1.67	2.12	1.97	2.41	1.69	1.97	1.95	1.82	1.86
Standard Deviation	1.05	1.36	1.15	1.56	.96	1.03	1.17	1.16	1.14

Test for mean differences between regions: F (7,361) = 1.57 (not significant at .05 probability level)

APPENDIX IV-4

DAY CARE HOME PARENTS RESPONSES TO THE PROPOSAL FOR THE STATE TO NO LONGER REGULATE DAY CARE HOMES IN ANY WAY

	Region								
Response	1 Chicago	2 Joliet	3 Rockford	4 Peoria	5 Champaign	6 Springfield	7 So. Ill.	8 E. St. Louis	Overall
Strongly Disagree	59	35	57	61	54	60	32	53	50
Disagree	31	35	18	22	29	23	33	31	29
Neutral/Undecided	8	15	11	4	14	7	21	12	13
Agree	0	15	7	4	0	7	9	3	5
Strongly Agree	2	0	7	9	3	3	4	0	3
n	51	20	28	23	35	30	66	32	285
Mean	1.55	2.10	1.89	1.78	1.69	1.70	2.21	1.66	1.84
Standard Deviation	.81	1.07	1.29	1.28	.93	1.09	1.13	.83	1.06

Test for mean differences between regions $F(7,277) = 2.28$ ($p < .05$)

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APPENDIX IX-5

DAY CARE HOME OPERATORS AND PARENTS RESPONSES TO A PROPOSAL FOR THE STATE TO REGISTER DAY CARE HOMES

Respondent		Region 1 Chicago	2 Joliet	3 Rockford	4 Peoria	5 Champaign	6 Springfield	7 So. Ill.	8 E. St. Louis	Overall
Operators	% Yes	23	29	31	38	21	30	24	24	25
	n	85	14	29	21	53	27	66	33	328
Parents	% Yes	15	21	19	19	15	3	20	15	18
	n	48	19	26	21	33	29	61	26	263

Test for differences in proportion answering yes between regions:

For operators X^2 (7df) = 4.50 (not significant)

For parents X^2 (7df) = 9.10 (not significant)

APPENDIX IX-6

REASONS DAY CARE HOME PARENTS GAVE FOR FAVORING OR NOT FAVORING A PROPOSAL FOR THE REGISTRATION OF DAY CARE HOMES*

RESPONSES FOR THOSE FAVORING THE PROPOSAL.

1. "If the State would still come out and inspect once a year, it would still be the same."

2. "I don't really feel that a State inspector can be a judge of the care given children. It's the parents who know what kind of care is given."

3. "I feel that registration and inspection once a year should be sufficient."

4. "I believe I am capable of deciding whether or not a person would be capable of watching my children. If I were not satisfied, I would change babysitters."

5. "I would approve, as long as some one still inspects once a year or periodically."

6. "Cut down on cost of inspectors."

7. "As long as they are inspected and know homes for day care, it would hopefully keep up quality of care for a child."

8. "I think if there are 8 or fewer children in a home and they are inspected once a year. It is alright if they are not licensed. I think a mother can tell if their children are given the right care in another home."

9. "This would eliminate some possible problems for the operator seems easier and more convient to register."

10. "I don't care if they have a license."

11. "A parent should be able to decide about the quality of a sitter and her home and what kind of care this parent's child is getting. If it is poor quality, the child should not be there and the parent should answer for his own mistake."

*All responses are given in their entirety without editing except for the deletion of individual names.

RESPONSES FOR THOSE NOT FAVORING THE PROPOSAL

1. "Some people should not have someone elses children under their care--for reasons of health, temperment home and family situations. Regular inspections help keep operator on her "Toes." Strangers to an area need a form of protection in selecting a "home or center" for their children."

2. "Because the inspection could conceivably not occur for up to 12 months, children could be endangered by an unsafe environment for that length of time."

3. "I would be afraid that to many would get into this type of work that shouldn't be."

4. "Abuse could occur between the inspections--also, licensing carries more a threat or an incentive to quality homes."

5. "We can always hire someone who is not licensed, especially for a one-to-one basis with our child. However, if there are several children in the home, the woman is no longer a "siter." She is running a profitable business, and is handling a precious commodity. She should have to maintain strict standards."

6. "I have faith in the state "requirements"-a working mother like me must be able to count on the best care possible!"

7. "I think anyone running a day care home should have licenses and it should be inspected often. And if not up to standards, the parents of the children being taken care of should be notified."

8. "If the home is not checked before registration, who would know what kind of care the kids are getting, only the operator and its hard to criticize yourself."

9. "I think the home should be licensed and be inspected before hand."

10. "They should be licensed for their own protection as well as the child's protection."

11. "I'm sure many day care homes would not be registered, thus, the inspections or controls would be completed."

12. "They should be required to demonstrate responsibility before being licensed thus showing a genuine interest about the care and safety of the children with whom she will be intrusted."

13. "I feel having the license keeps the center more alert and on "Their toes" so to speak. And by having a renew this license or to get in the first place makes the license aware that she must keep up the impression she first gave in person."

APPENDIX X-1

AGENCY RESPONSES

It is IEFC policy to provide with each program evaluation an appendix in which agencies mentioned in the report can respond to specific statements or recommendations. Interested agencies were invited to respond and were assured that their responses would not be edited in any way.

A written reply was received from the Department of Children and Family Services.

14. "Who protects the child if unfeeling parents place them in the care of less than adequate baby sitters."

15. "I feel that if a home is not adequate to begin with it should not be given a license."

16. "If the homes were not inspected before licensing, the chances are that a license could be issued to someone who would not take good care of the child while they were away."

17. "I don't understand how any mother could leave a child with someone who wasn't checked out. If you don't inspect before registration, how could someone know whether their child would be abused or not. A yearly inspection may be too late."

18. "I would not want my child in a home that after a year would be inspected and found unfit."

19. "License used by the State is an assurance that the home is reasonably safe and good, I don't feel that registration alone would give that assurance."

20. "The fact that you inspect and license facilities is the only reason I trusted my child in such a facility."

21. "As in nursing homes-5 State control-quality lags. I feel more secure knowning that definite standards are being met."

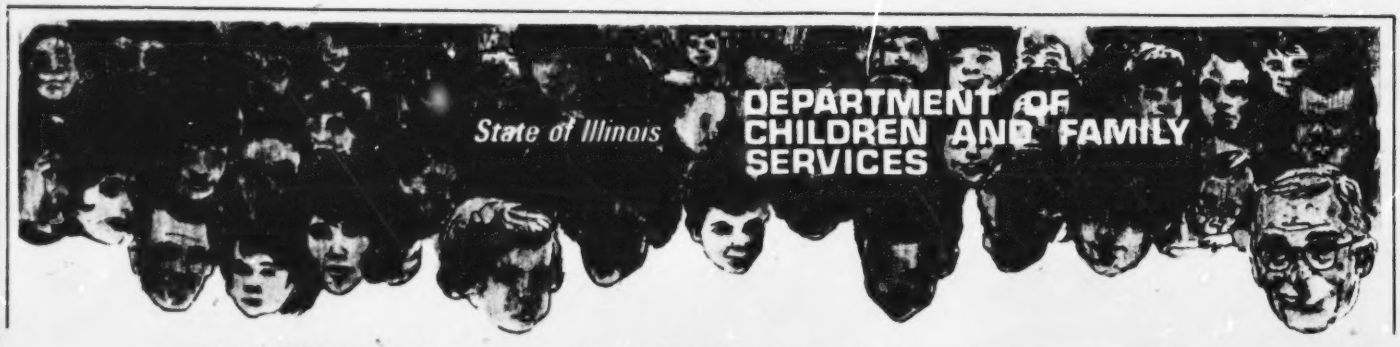
22. "I believe that homes should be inspected more than once a year and that they meet certain standards for licensing. Registering seem to infer less quality than licensing."

23. "I think homes definitely should be inspected prior to registration. If the homes are not fit for day care, it is a waste of time and money to register and not be fit. I also feel that the homes should be inspected many more times than once a year. In a years time the home and the person heading it could change dratically, and I think a close watch should be kept, just to make sure every thing is fit for the children involved."

24. "It's a business the State must check it out just like other small business."

25. "What happens between the registration and the inspection? Sometimes, too much. Inspection should take place before a person operates a day care home."

26. "A lot of damage could be done before the first inspection. Why allow a home to serve for mothers inadequately, and be closed when inspection reveals inadequacy."



State Administrative Offices • 524 South Second Street • Springfield, Illinois 62706

September 9, 1974

Mark Lincoln Chadwin
Director
Illinois Economic and Fiscal Commission
610 State Office Building
Springfield, Illinois 62706

Dear Mr. Chadwin:

This will acknowledge receipt of the draft of the Commission's program evaluation of Day Care Licensing and Regulation. I have read the report carefully and assure you that all findings and recommendations of the Commission will receive my serious consideration.

It is too early for me to outline specific measures the Department may take in response to the report, but I am scheduling a series of meetings with both program and fiscal staff to explore various alternatives for strengthening our day care regulatory services.

Let me commend your staff for the direct, thorough, and scholarly approach they used in developing the report. It is a perceptive, highly readable analysis of issues related to an important child welfare service that has historically received too little priority both in Illinois and throughout the nation.

Sincerely,

Mary Lee Leahy

Mary Lee Leahy
Acting Director

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